

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

| Date | Attorney | Hours | Bill Rate | Amount | Memo |
|-----------|----------|-------|-----------|----------|--|
| 11/1/2022 | EK | 0.1 | \$300.00 | \$30.00 | [REDACTED] |
| 11/2/2022 | EK | 0.8 | \$300.00 | \$240.00 | Review ECF bounce from Court with USDJ Order denying motion for attorneys' fees without prejudice; correspondence and conference with client regarding same; correspondence with opposing counsel regarding request for extension of time to oppose Defendants' letter motion for a pre-motion conference; review voice message from opposing counsel; conference with opposing counsel regarding same; draft and file consent letter motion for extension of time to file letter response in opposition and concerning extension of time for Vito to respond to complaint. |
| 11/3/2022 | EK | 0.2 | \$300.00 | \$60.00 | Review ECF bounce from Court with USDJ Order granting extension of time to file letter response in opposition to letter motion for pre-motion conference and extending Vito's deadline to respond to complaint; correspondence with client regarding meeting with Nick Elefterakis; correspondence with counsel for Nick Elefterakis regarding meeting; calendar meeting; conference with client regarding strategy; correspondence with JSF regarding conference with client to discuss strategy. |
| 11/4/2022 | JF | 0.5 | \$450.00 | \$225.00 | Conference call with client and E. Kataev |
| 11/4/2022 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with JSF and client regarding strategy conference concerning [REDACTED]; review reply correspondence from JSF regarding calendared meeting; calendar deadline to file letter response in opposition to letter motion for pre-motion conference concerning defamation claim; review reply correspondence from JSF regarding same; conference with client regarding strategic developments; calendar conference with client and JSF; review reply correspondence from JSF regarding same; correspondence with client regarding same; correspondence with JSF regarding questions client prepared for meeting; conduct strategy conference with JSF and client regarding [REDACTED]. |
| 11/6/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with client regarding [REDACTED]; review reply correspondence from RFM regarding [REDACTED]. |
| 11/7/2022 | JF | 0.6 | \$450.00 | \$270.00 | Interoffice meeting with E. Kataev; conference call with client regarding [REDACTED] |
| 11/7/2022 | EK | 1 | \$300.00 | \$300.00 | Conference and correspondence with client regarding meeting; [REDACTED]; correspondence with forensic analyst and opposing counsel regarding status of production; post-mortem with client. |
| 11/7/2022 | EK | 2 | \$- | \$- | Travel time. |
| 11/8/2022 | JF | 0.1 | \$450.00 | \$45.00 | [REDACTED] |

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| 11/8/2022 | EK | 0.8 | \$300.00 | \$240.00 | [REDACTED] |
| 11/9/2022 | JF | 0.2 | \$450.00 | \$90.00 | [REDACTED] |
| 11/9/2022 | EK | 0.6 | \$300.00 | \$180.00 | [REDACTED] post-mortem conference with client regarding same and follow up with forensic analyst regarding status of production; correspondence with forensic analyst regarding same; forward same to client via email; forward prior request for update to client via email. |
| 11/10/2022 | JF | 0.3 | \$450.00 | \$135.00 | Interoffice meeting with E. Kataev; review response to pre-motion conference request |
| 11/10/2022 | EK | 0.8 | \$300.00 | \$240.00 | Correspondence with client regarding [REDACTED]; conference with client regarding GPS device; conference and correspondence with private investigator regarding same; draft letter response in opposition to Defendants' letter motion for pre-motion conference concerning defamation claim; discussion with JSF regarding same; submit same to JSF via email; forward same to client via email; conference with client regarding same and private investigator; correspondence with private investigator providing authorization to move forward with investigation; forward same to client, RFM, and JSF via email; review reply correspondence from JSF with revisions to letter response in opposition; finalize and file same with Court via ECF; correspondence with JSF regarding same. |
| 11/11/2022 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with forensic analyst regarding update; forward same to client, RFM, and JSF via email; correspondence and conference with client regarding same; review ECF bounce from opposing counsel with reply letter regarding defamation claim; correspondence with client regarding same; [REDACTED] correspondence with private investigator regarding authorization, investigation, and requested information; forward same to client via email; extensive correspondence with private investigator regarding logistics; forward same to client via email; correspondence with client and private investigator regarding same. |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)

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| 11/12/2022 | EK | 0.2 | \$300.00 | \$60.00 | Extensive correspondence with Roa, client, and private investigator regarding canvas; conference with private investigator and client, respectively, regarding same; correspondence and conference with private investigators regarding efforts to secure records from manufacturer and retailer; correspondence with RFM and JSF regarding videos found by Roa. |
| 11/13/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with private investigator and client regarding status of investigation; forward same to RFM and JSF via email. |
| 11/14/2022 | JF | 0.1 | \$450.00 | \$45.00 | E-mail correspondence with client regarding contempt motion |
| 11/14/2022 | EK | 0.3 | \$300.00 | \$90.00 | Correspondence with private investigator and client regarding Dropbox link for video; correspondence with expert witness support Teklicon; correspondence with JMK and private investigator regarding OneDrive link for video upload; forward same to client via email; correspondence with client and JSF regarding affidavit from [REDACTED]; conference with client regarding next steps and various developments with case. |
| 11/15/2022 | EK | 0.3 | \$300.00 | \$90.00 | [REDACTED]; review calls from private investigator; correspondence and conference with private investigator regarding developments with investigation; correspondence with client regarding exhibits [REDACTED]. |
| 11/16/2022 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with client regarding photos [REDACTED]; correspondence with client regarding response from GoDaddy regarding subpoena and payment for same; correspondence with Roa and private investigator regarding investigation and termination thereof; correspondence with client and JSF regarding same; conference with private investigator regarding same; [REDACTED]; correspondence with client regarding same; conference with client regarding same and private investigator; [REDACTED]; correspondence with private investigator regarding video obtained from investigation; forward same to client via email. |
| 11/17/2022 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence and conference with private investigator regarding proposal to return to case; correspondence with JMK regarding playing video and codec for same; review video footage; correspondence with private investigator regarding conference; conduct conference with private investigator regarding case; conference with private investigator regarding strategy; correspondence with Shalit, Roa, and client regarding action for pre-suit discovery; conference with client regarding case; correspondence with forensic analyst regarding discovery; forward same to client, RFM, and JSF via email; correspondence with private investigator regarding contact information for assigned detective. |

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| 11/18/2022 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with forensic analyst and opposing counsel regarding conference; forward same to client via email; correspondence with client regarding same; correspondence with Detective regarding case; submit same to private investigator via email; forward same to client via text message. |
| 11/19/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence and conference with private investigator regarding detective and returning to investigation; conference with client regarding same. |
| 11/20/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with with detective regarding case; forward same to private investigator and client via email; correspondence with JMK regarding codec for video. |
| 11/21/2022 | EK | 1.5 | \$300.00 | \$450.00 | Conference and correspondence with Shalit regarding joint defense agreement and criminal investigation of GPS device; correspondence with forensic analyst and opposing counsel regarding conference; review and accept calendar invitation for virtual meeting; calendar virtual meeting; conduct virtual meeting with forensic analyst and opposing counsel; review ECF bounce from Court with USDJ Order scheduling pre-motion conference; review reply correspondence from JSF regarding virtual meeting with forensic analyst; correspondence with all counsel of record and USMJ Cho concerning adjournment of conference today and inability to access conference; correspondence and conference with client regarding forensic analyst virtual meeting and next steps; correspondence with forensic analyst and opposing counsel regarding privilege; correspondence with forensic analyst regarding invoice; correspondence and conference with client regarding virtual meeting to review forensic analyst's needs; calendar virtual meeting with client; conduct virtual meeting with client; correspondence with client regarding [REDACTED] [REDACTED] |

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| 11/22/2022 | EK | 1 | \$300.00 | \$300.00 | Calendar in-person pre-motion conference before USDJ Chen; review reply correspondence from JSF regarding same; conference with opposing counsel regarding yesterday's correspondence from USMJ Cho concerning conference; correspondence with Court and all current counsel of record regarding same; correspondence with client forwarding email from opposing counsel to forensic analyst concerning privilege; correspondence with client forwarding invoice from forensic analyst with counsel and advice regarding same; correspondence with forensic analyst regarding submission of invoice to client; correspondence with client regarding payment to forensic analyst; conference with private investigator regarding Roa and investigation; correspondence with Detective Oswaldo Rivera concerning representation, docket report, and private investigator; forward same to client, RFM, and JSF via email with request for conference with Roa; correspondence with private investigator regarding returning to investigation; conference with client and Roa regarding investigation; correspondence with client regarding contact at forensic analyst regarding billing; forward same to forensic analyst with correspondence regarding same; correspondence with private investigator regarding conference with Roa and release. |
| 11/23/2022 | JF | 0.2 | \$450.00 | \$90.00 | E-mail correspondence regarding C. Roa |
| 11/23/2022 | EK | 0.6 | \$300.00 | \$180.00 | Draft joint cooperation agreement; correspondence with Shalit, Roa, JSF, and client regarding same; correspondence with Shalit, Roa, JSF, and client regarding communication to private investigator; [REDACTED]; review correspondence from JSF and Shalit regarding same; correspondence with private investigator regarding [REDACTED] |
| 11/24/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with counsel for Roa regarding [REDACTED] correspondence with counsel for Roa, RFM, JSF, and client regarding emails exchanged with private investigator regarding [REDACTED] |
| 11/25/2022 | EK | 0.1 | \$300.00 | \$30.00 | Set reminder regarding [REDACTED]. |
| 11/28/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with proposed expert [REDACTED] and client; review voice message from private investigator. |

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| 11/29/2022 | EK | 0.3 | \$300.00 | \$90.00 | Correspondence with client regarding domain name list to be sent to forensic analyst, payment to forensic analyst, and first production of documents by forensic analyst; correspondence with private investigator and client regarding conference; correspondence with counsel for Nicholas Elefterakis regarding settlement; correspondence with [REDACTED] regarding expert witness; forward same to client via email; review correspondence from forensic analyst with invoice; correspondence with private investigator and client regarding [REDACTED]. |
| 11/30/2022 | EK | 0.7 | \$300.00 | \$210.00 | with private investigator regarding case (X2); correspondence with client regarding Defendants' violation of temporary restraining Order; correspondence with client forwarding invoice from forensic analyst; correspondence with forensic analyst regarding submission of same; correspondence with counsel for Roa and client regarding [REDACTED]; correspondence with forensic analyst regarding balances due and request for statement of account; correspondence with forensic analyst and client regarding same; forward same to client under separate cover; correspondence with client regarding same and production of documents; correspondence with private investigator regarding video enhancement; correspondence with all counsel of record regarding consent letter motion for extension of time; revise and finalize consent letter motion; revise and finalize proposed scheduling Order; file same with Court via ECF. |
| 12/1/2022 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with client regarding Defendants' contempt; correspondence with client regarding [REDACTED]; correspondence with client regarding Roa; review ECF bounce from Court with USDJ Order granting extension of time to complete discovery; conference with Shalit and client regarding [REDACTED] correspondence with client regarding Roa; revise joint cooperation agreement and submit same to Shalit, client, and JSF via email; correspondence with Roa, private investigator, Shalit, and client regarding waiver; forward same to JSF via email with correspondence regarding same; correspondence with client regarding invoice from forensic analyst; correspondence and conference with private investigator regarding NYPD Detective's findings concerning Staten Island private investigator; correspondence with JMK regarding meeting; draft preservation letter to Land Sea Air and submit same to Shalit and JMK via email; forward same to client, private investigator, and JSF via email. |
| 12/2/2022 | EK | 0.1 | \$300.00 | \$30.00 | Review correspondence from Shalit with executed counterpart to joint cooperation agreement; review correspondence from client with executed counterpart; review reply correspondence from Shalit regarding same; discussion with JSF regarding same. |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)

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| 12/3/2022 | EK | 0.1 | \$300.00 | \$30.00 | Update calendared deadline to complete all fact discovery; review reply correspondence from JSF regarding same. |
| 12/4/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with client regarding case. |
| 12/5/2022 | JF | 0.1 | \$450.00 | \$45.00 | Review joint defense agreement |
| 12/5/2022 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with JSF, Shalit, Roa, and client regarding and attaching fully executed joint cooperation agreement; correspondence with client regarding appearance before USDJ Chen tomorrow; correspondence with private investigator regarding conference; conference with client regarding strategy; correspondence with client regarding invoices from forensic examiner. |
| 12/6/2022 | JF | 0.4 | \$450.00 | \$180.00 | Interoffice meeting with E. Kataev |
| 12/6/2022 | EK | 1.5 | \$300.00 | \$450.00 | Conference with private investigator regarding developments [REDACTED] [REDACTED] review voice message from private investigator; conference with client regarding same; conference with private investigator and client regarding developments with [REDACTED] and private investigator most likely hired by Defendants; review ECF bounce from Court with USDJ minute entry for proceedings held on pre-motion conference; correspondence with BRG and client regarding payment; conference and correspondence with client regarding John Doe lawsuit in federal court and lack of subject matter jurisdiction for same; begin drafting verified petition for pre-action discovery together with supporting documents such as proposed Order to show cause, affirmation in support, emergency affirmation in support. |
| 12/6/2022 | EK | 1.5 | \$- | \$- | Travel time. |
| 12/7/2022 | EK | 2.2 | \$300.00 | \$660.00 | Draft proposed correspondence to forensic analyst and submit same to client, RFM, and JSF via email with notes regarding same; conference with JSF regarding strategy on pre-action disclosure; finalize verified petition and related papers; submit same to client and private investigator via email with correspondence regarding same; correspondence with private investigator regarding same; correspondence with client and Roa's new counsel regarding pre-action disclosure special proceeding; correspondence with client regarding proposed correspondence to forensic analyst; correspondence with Roa's new counsel regarding letterhead for preservation letters; conference with private investigator regarding status of case; conference with client regarding logistical issues; conference and correspondence with JMK regarding preservation letters; conduct conference with private investigator regarding same; correspondence with private investigator regarding video; correspondence with private investigator and client regarding items for letter; correspondence with court reporter requesting transcript from yesterday's conference. |

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| 12/8/2022 | JF | 0.1 | \$450.00 | \$45.00 | Interoffice meeting with E. Kataev |
| 12/8/2022 | EK | 1 | \$300.00 | \$300.00 | Correspondence with Roa's additional counsel regarding letterhead and conference; calendar virtual meeting with Roa's additional counsel; conduct virtual meeting with Roa's additional counsel; correspondence and conference with JSF regarding review of proposed email to forensic analyst; review, revise, and submit same to forensic analyst and opposing counsel via email; forward same to client, RFM, and JSF via email with correspondence regarding same; review correspondence from forensic analyst addressing points; forward same to client, RFM, and JSF via email; correspondence with client regarding contents and conference to discuss same; calendar virtual meeting with client; conduct virtual meeting to review and respond to forensic analyst's response; correspondence with private investigator and client regarding revisions to petition for pre-action disclosure; correspondence with Roa's additional counsel regarding error in petition; submit response to forensic analyst and opposing counsel via email with correspondence regarding same; correspondence with Roa's additional counsel regarding papers to be filed with Court; forward same to private investigator via email. |
| 12/9/2022 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with Roa's additional counsel regarding assignment of index number; correspondence with Roa's additional counsel regarding motion information updated and assignment of case judge; review voice message from private investigator; review and accept calendar invitation from Roa's additional counsel for appearance on Order to show cause; correspondence with Roa's additional counsel regarding same and subpoenas. |
| 12/10/2022 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with private investigator regarding update on investigation; correspondence with private investigator regarding billing; correspondence with Roa and client regarding question by investigator; forward same to private investigator via email; correspondence with prospective client regarding same. |
| 12/11/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with client regarding invoice from private investigator. |

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| 12/12/2022 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with additional counsel for Roa and client regarding appearance on Order to show cause, subpoenas, and service by publication, and signed Order to show cause; attempted conference with process server regarding same; conduct virtual meeting with private investigator; correspondence with private investigator regarding Stanulis; correspondence with private investigator regarding device information; correspondence with private investigator regarding photos of Safa & Vito; draft subpoena to Silver Shield and Stanulis during virtual meeting with private investigator; submit same to Roa's additional counsel, client, and private investigator via email with correspondence regarding same; correspondence with private investigator regarding picture of device with serial number; draft preservation letter to Land Air Sea with private investigator during virtual conference; submit same to Roa's additional counsel and client via email with correspondence regarding same; forward same to private investigator via email. |
| 12/13/2022 | EK | 0.3 | \$300.00 | \$90.00 | Correspondence with private investigator regarding address for Stanulis; correspondence with court reporter and opposing counsel regarding transcript fee; review voice message from opposing counsel; conference with opposing counsel; correspondence with Roa's additional counsel, client, and Roa regarding executed subpoena, electronically filed subpoena, NYSCEF confirmation for same, and preservation letter to LandAirSea; correspondence with Roa's additional counsel regarding conformed copy of Order to show cause; correspondence with client, Roa, and his additional counsel regarding Roa's additional counsel unavailability; discussion with RFM regarding payment of private investigator; conference with client regarding same and related case issues; make payment to private investigator; correspondence with client, RFM, and accounting department regarding same. |
| 12/14/2022 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with client regarding reimbursement for private investigator; forward same to SF, RFM, and accounting department to process; review correspondence from SF with payment; correspondence with Roa's additional counsel regarding Order to show cause; correspondence with court reporter and opposing counsel regarding transcript; correspondence with private investigator and client regarding request to serve subpoena; review voice message from private investigator; correspondence with Roa's additional counsel regarding conference to discuss case; correspondence and conference with private investigator regarding strategy; correspondence with Roa and client regarding pictures of Defendants' henchmen. |
| 12/15/2022 | JF | 0.2 | \$450.00 | \$90.00 | Interoffice meeting with E. Kataev; e-mail correspondence with client |

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| 12/15/2022 | EK | 1.4 | \$300.00 | \$420.00 | <p>[REDACTED]</p> <p>correspondence with court reporter and opposing counsel regarding invoice for transcript; AG and MLLG with request for payment; [REDACTED];</p> <p>correspondence with Roa and client regarding pictures of Defendants' henchman; forward same to private investigator via email; correspondence with Roa's additional counsel regarding conference; correspondence with forensic analyst regarding payment of invoices; correspondence with forensic analyst regarding status of forensic examination; forward same to client via email with correspondence regarding same; correspondence with client regarding same; correspondence with JMK regarding preservation letter to cloud service provider; correspondence with client regarding [REDACTED]; correspondence with client regarding strategy email and follow up; correspondence with client regarding [REDACTED]; extensive correspondence with JSF regarding status of case and developments as well as response to client; correspondence with client, JSF, and RFM regarding [REDACTED]</p> <p>[REDACTED] submit same to client, RFM, and JSF via email with correspondence regarding same and [REDACTED];</p> <p>correspondence with forensic analyst and opposing counsel regarding follow up on issues; forward same to client via email with correspondence regarding same.</p> |
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| 12/16/2022 | EK | 1.7 | \$300.00 | \$510.00 | Review correspondence from forensic analyst with Kiteworks account activation; correspondence with client regarding [REDACTED]; correspondence with client regarding conference; calendar virtual conference with client; conduct virtual meeting with client regarding [REDACTED]; correspondence with JSF regarding review of stipulation; review correspondence from JSF with revised stipulation of settlement; review and revise stipulation of settlement with client; submit same to JSF via email for review; correspondence with JSF regarding same; calendar depositions of Safa and Vito; calendar deposition notice reminder; correspondence with counsel for [REDACTED] regarding conference to obtain background report; forward same to client via email; review reply correspondence from JSF regarding calendared depositions and related deadlines (x3); review correspondence from JSF with draft discovery demands; review correspondence from forensic analyst with deletion analysis documents; activate account with Kiteworks; review correspondence from forensic analyst with Kiteworks activation email; extensive correspondence with client providing all deletion analysis documents; review correspondence from forensic analyst regarding issues; review files during virtual meeting with client; [REDACTED] correspondence with client regarding analysis of deletion; forward same to JSF via email; conference with private investigator regarding meeting with Stanulis, other Defendants, and forensic examination issues; correspondence with client regarding same; correspondence with private investigator providing deletion analysis documents; correspondence with private investigator regarding [REDACTED] conference with opposing counsel regarding forensic analysis documents, consent to extend time for affirmative expert disclosures, and related case matters; draft letter motion for extension of time regarding affirmative expert disclosures and submit same to counsel for Roa via email with correspondence regarding same; conference with counsel for Roa regarding same; correspondence with additional counsel for Roa regarding conference; correspondence with forensic analyst regarding billing; forward same to client and JSF via email; correspondence with opposing counsel and forensic analyst regarding [REDACTED]; forward same to client via email with [REDACTED] |
| 12/16/2022 | JF | 4.5 | \$450.00 | \$2,025.00 | Draft document demands; review [REDACTED]; conference with E. Kataev |
| 12/17/2022 | EK | 0.3 | \$300.00 | \$90.00 | Extensive correspondence and conference with forensic analyst regarding billing; correspondence and conference with client regarding same; correspondence with client, RFM, and JSF regarding Defendants' contact with our customers. |

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| 12/18/2022 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with court reporter regarding transcript and partial refund; conduct research regarding special damages for defamation claim; correspondence with client regarding transcript, defamation claim, strategy on amending complaint and opposing motion to dismiss, and research in support of same; correspondence with client regarding forensic analysis and payment for same by Defendants. |
| 12/19/2022 | EK | 1.2 | \$300.00 | \$360.00 | <p>Calendar deadline to amend complaint; review reply correspondence from JSF regarding same; correspondence with PS regarding payment; correspondence with Roa and client regarding different forensic analyst; correspondence with opposing counsel and forensic analyst regarding production issues; forward same to client, RFM, and JSF via email; correspondence with client regarding same; correspondence with forensic analyst and opposing counsel regarding conference to discuss status and scheduling of same; forward same to client, RFM, and JSF via email;</p> <p>correspondence with client, RFM, and JSF regarding payment to forensic analyst and wire information for same; correspondence with AG and accounting department regarding anticipated refund for over payment to court reporter; review ECF bounce from Court with USMJ Order granting consent letter motion for extension of time of expert discovery schedule; update court docket and file; update all calendared deadlines; review reply correspondence from JSF regarding same (x4); correspondence with opposing counsel regarding year over year sales by customer summary; forward same to client, RFM, and JSF via email; extensive correspondence with client, JSF, and RFM as well as conference with client regarding same, conference with private investigator regarding meeting with Stanulis and strategy; correspondence with client regarding same; correspondence with opposing counsel seeking sworn statement from Defendants concerning QuickBooks; forward same to client, RFM, and JSF via email; draft letter motion for discovery and submit same to client, JSF, and RFM via email; conference and correspondence with client and JSF, respectively, regarding same; review and accept calendar invitation for conference with forensic examiner; correspondence with opposing counsel attaching year-over-year sales by customer summaries (x2); forward same to client, RFM, and JSF via email; conference with client regarding same.</p> |

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| 12/20/2022 | EK | 1.8 | \$300.00 | \$540.00 | Correspondence with Roa and client regarding expert witness for cybersecurity; correspondence with client regarding [REDACTED] [REDACTED] correspondence with client regarding revisions to anticipated letter motion; correspondence with client regarding pre-virtual meeting conference; correspondence with private investigator regarding check for subpoena; conference with private investigator regarding Stanulis license; draft subpoena to NYSDOS Division of Licensing Services; submit same to private investigator and client via email with correspondence regarding same; correspondence with client and Roa regarding financials comparison between WatchDog & Companions; draft letter to forensic analyst regarding additional avenues to search; calendar virtual meeting with forensic analyst; conduct pre-virtual meeting conference with client; conduct virtual meeting with forensic analyst and opposing counsel; review voice messages from private investigator; correspondence with private investigator regarding conference; conduct conference with private investigator and client regarding interview of Stanulis; correspondence with private investigator regarding composition book and preservation of same; correspondence with AG and accounting department regarding check for subpoena witness fee. |
| 12/21/2022 | EK | 1 | \$300.00 | \$300.00 | Correspondence with client and Roa regarding breakdown of sales by customer between our client and Defendants; correspondence with JSF and RFM regarding same; correspondence with forensic analyst and opposing counsel regarding productions and whether Defendants have paid; forward same to client, RFM, and JSF via email; correspondence with additional counsel for Roa regarding virtual meeting; correspondnence with court reporter regarding revised invoice and submission of refund; forward sam to AG and accounting department via email with correspondence regarding same; calendar virtual meeting with Roa's additional counsel; conduct virtual meeting with Roa's additional counsel regarding status, developments, and next steps; correspondence with AG regarding subpoena check; correspondence with forensic analyst regarding invoice; correspondence with forensic analyst and opposing counsel regarding document production; conference with client regarding same; attempted conference with opposing counsel; correspondence with client regarding same; conference with opposing counsel regarding document production; correspondence with client regarding same; correspondence with client regarding privilege markings and discovery. |
| 12/22/2022 | JF | 0.2 | \$450.00 | \$90.00 | Review and revise letter to court regarding discovery |

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| 12/22/2022 | EK | 1 | \$300.00 | \$300.00 | Conference and correspondence with client regarding status of discovery; correspondence with client regarding review of privileged documents; correspondence with Roa's additional counsel and client regarding outline of discussions; extensive correspondence with forensic analyst and opposing counsel regarding status of production and privilege log; forward same to client, RFM, and JSF via email; correspondence with forensic analyst and opposing counsel regarding billing; forward same to client and JSF via email; review and revise letter motion regarding Defendants' failure to pay BRG; correspondence with client and discussion with JSF regarding review and further revision of same; revise and resubmit letter motion to client and JSF via email with correspondence regarding same; correspondence with forensic analyst regarding Relativity access; forward same to client via email; review correspondence from Relativity; correspondence with Roa's additional counsel regarding service by publication; correspondence with forensic analyst regarding privacy of Relativity designations; correspondence with client regarding [REDACTED]; review reply correspondence from JSF with further revised letter motion regarding fees due to BRG by Defendants; review, revise, and finalize letter motion regarding BRG fees; submit same to client via email with correspondence regarding same; correspondence with client regarding hot documents in production; correspondence with client regarding training information stolen by Defendants; correspondence with forensic analyst and opposing counsel regarding cost of uploading additional batches of documents via Relativity and our request for a conference; forward same to client via email with correspondence regarding strategy to address same. |
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IME WatchDog, Inc. v. Gelardi; No. 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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|------------|----|-----|----------|----------|---|
| 12/23/2022 | EK | 0.9 | \$300.00 | \$270.00 | Extensive correspondence with forensic analyst and opposing counsel regarding conference to discuss Relativity function and costs of Relativity; correspondence with Roa's additional counsel regarding service by publication of Order to show cause and deadline for same; extensive correspondence with clients regarding Relativity strategy and need for conference with forensic analyst to discuss cost saving approaches; conference with forensic analyst regarding need for conference; review and accept calendar invitation for conference; calendar same; conduct virtual meeting with forensic analyst and opposing counsel regarding Relativity functionality and cost-saving measures; conference with client regarding strategy with Relativity; correspondence with forensic analyst and opposing counsel regarding loading second and third batch of production of documents; forward same to client via email; correspondence with Roa's additional counsel regarding contact by Stanulis' attorney for conference; correspondence with client and private investigator regarding same; conference with private investigator regarding strategy with Stanulis; correspondence with CCM regarding same; correspondence with JSF regarding conference with Stanulis; correspondence with client and JSF regarding filing of letter motion concerning Defendants' failure to pay forensic analyst. |
| 12/24/2022 | EK | 0.8 | \$300.00 | \$240.00 | Correspondence with client regarding review of records on Relativity; correspondence with client regarding Elefterakis stipulation; correspondence with Roa's additional counsel regarding service by publication; correspondence with client regarding exporting document review according to classification; correspondence with client regarding functionality limitation; review discovery of all responsive documents on Relativity; correspondence with client regarding specific documents (x2); correspondence with Roa and client regarding asset protection and other evidence. |
| 12/25/2022 | EK | 1.4 | \$300.00 | \$420.00 | Extensive correspondence with client, Roa, and JSF regarding Defendants' formation of IME GuardDog Inc and related matters; review documents on Relativity; correspondence with client regarding specific set of documents consisting of training materials utilized by Defendants; [REDACTED] submit same to client, JSF, and RFM via email; correspondence with private investigator regarding moving conference; correspondence with Roa's additional counsel regarding same; [REDACTED]. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 12/26/2022 | EK | 1 | \$300.00 | \$300.00 | Review documents on Relativity; prepare summonses for Greg Elefterakis, Pollak, Bridda, and Liakas; submit same to client via email with correspondence regarding same; extensive correspondence with client regarding Defendants' accountant and the addresses for his office; correspondence with Roa's additional counsel regarding service by publication; review correspondence from Roa's additional counsel to counsel for Stanulis; correspondence with Roa's additional counsel and private investigator regarding conference to discuss plan for call with Stanulis' counsel; conduct conference with Roa's additional counsel and private investigator to prepare for call; correspondence with Roa's additional counsel regarding same; calendar conference with Stanulis' counsel; conduct conference with Stanulis' counsel, Roa's additional counsel, and private investigator; conduct post-mortem conference with private investigator; conduct post-mortem conference with Roa's additional counsel; conduct conference with client regarding update on Stanulis; correspondence with Roa's additional counsel regarding coordination of deposition date; correspondence with forensic analyst and opposing counsel regarding discovery and download functionality on Relativity; forward same to client, RFM, and JSF via email; review automatic reply correspondence from forensic analyst; forward same to client via email; correspondence with client regarding discovery; extensive correspondence with client and Roa regarding serving remaining Defendants. |
| 12/27/2022 | EK | 0.8 | \$300.00 | \$240.00 | Extensive correspondence with client, Roa, and JSF regarding service of amended complaint on new Defendants; correspondence with forensic analyst and opposing counsel regarding second & third batch of document production; correspondence with Roa's additional counsel regarding deposition of Stanulis; correspondence and conference with client and private investigator, respectively, regarding same; extensive correspondence with process server and Roa's additional counsel regarding service by publication; correspondence with forensic analyst and opposing counsel regarding downloading PDF files from Relativity; forward same to client via email; conference and correspondence with client regarding document review on Relativity; review correspondence from Relativity regarding download request; correspondence with client regarding virtual meeting to determine how to sort documents on Relativity. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 12/28/2022 | EK | 1.1 | \$300.00 | \$330.00 | <p>Correspondence with Roa, client, and JSF regarding serving remaining Defendants; correspondence with client regarding virtual meeting to review sorting in Relativity; correspondence with client forwarding email from forensic analyst with information about additional batches; calendar release date following privilege review of second and third batches; review reply correspondence from client; revise and file proposed summonses for Gregory Elefterakis, Roman Pollak, Anthony Bridda, and Nicholas Liakas; correspondence with Roa's additional counsel regarding deposition of Stanulis; update calendared depositions of Safa & Vito; calendar deposition of Stanulis; review correspondence from counsel for Elefterakis with revised stipulation of settlement; correspondence with client and JSF regarding same; [REDACTED] review reply correspondence from JSF regarding depositions (x3); calendar virtual meeting with client for Relativity document review; conduct virtual meeting with client to download Batch 1 of forensic production; review correspondence from Relativity regarding same (x4); correspondence with client providing Dropbox link to hot documents, responsive documents, and unresponsive documents to Batch 1 of forensic production; correspondence with client regarding [REDACTED] review reply correspondence from client regarding depositions (x3); correspondence with client regarding Relativity download request from prior day; correspondence with client regarding Relativity virtual meeting; correspondence with process server regarding service by publication; forward same to Roa's additional counsel; correspondence with client regarding amendment of complaint or caption and removal of Batch 1 of forensic production from Relativity; correspondence with forensic analyst and opposing counsel regarding latter; forward same to client and JSF via email; correspondence with Roa, client, and JSF regarding status of service on remaining Defendants; correspondence with JSF regarding [REDACTED]; correspondence with forensic analyst and opposing counsel regarding next batches of documents; forward same to client via email.</p> |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 12/29/2022 | EK | 1.4 | \$300.00 | \$420.00 | Correspondence with Roa's additional counsel regarding Stanulis' deposition start time; forward same to client and JSF via email; correspondence with client regarding strategy email; correspondence with forensic analyst and opposing counsel regarding removal of first batch of production from Relativity; forward same to client via email; correspondence with Roa's additional counsel regarding demand for submission of documents in advance of subpoena; forward same to client, JSF, and private investigator via email; correspondence with client and JSF regarding strategy [REDACTED] [REDACTED] correspondence with forensic analyst and opposing counsel regarding payment; forward same to client and JSF via email; correspondence with client regarding same; correspondence with client regarding [REDACTED] [REDACTED] correspondence with client and JSF regarding strategy [REDACTED] [REDACTED] correspondence with process server regarding fees for service by publication; forward same to client and JSF via email; correspondence with client and JSF regarding same; correspondence with client regarding Bates stamped hot documents; correspondence with client, Roa, and JSF regarding issuance of summons. |
| 12/30/2022 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with Roa, client, and JSF regarding serving remaining Defendants; correspondence with client and Roa regarding witness for [REDACTED]; correspondence with client regarding engaging private investigator to interview [REDACTED] correspondence with Shalit and opposing counsel regarding [REDACTED]; forward same to client and JSF via email; correspondence with client regarding discovery; correspondence and conference with private investigator regarding [REDACTED]; conference with [REDACTED]; correspondence with private investigator regarding same; correspondence with forensic analyst and opposing counsel regarding removal of first batch of documents; forward same to client and JSF via email; correspondence with private investigator regarding software used by forensic analysts; correspondence with process server regarding service by publication; correspondence with private investigator regarding documents from Stanulis. |
| 12/31/2022 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with forensic analyst and opposing counsel regarding receipt of payment by Defendants. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/2/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with client, Roa, and JSF regarding attempted conference with clerk's office concerning issuance of summons; conference and correspondence with Shalit regarding letter motion to compel discovery; correspondence with Shalit and opposing counsel regarding responses to Roa's discovery demands; correspondence with client forwarding email from process server regarding cost of service by publication; correspondence with Shalit regarding [REDACTED]; update calendared reminder to issue deposition notices; review reply correspondence from JSF regarding same; correspondence with client, RFM, and JSF forwarding email from forensic analyst regarding receipt of payment from Defendants; correspondence with client regarding same. |
| 1/3/2023 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with JSF regarding proposed response to client concerning forensic analyst fees; conference with Shalit regarding [REDACTED]. |
| 1/4/2023 | EK | 0.2 | \$300.00 | \$60.00 | Conference with client regarding case and developments; correspondence with Roa's additional counsel and process server regarding service by publication. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/5/2023 | EK | 0.9 | \$300.00 | \$270.00 | Correspondence with client regarding payment to BRG; correspondence with Roa's additional counsel regarding oral argument on Order to show cause; extensive correspondence with opposing counsel and Shalit regarding motion to dismiss defamation claim; forward same to client, RFM, and JSF via email with correspondence regarding same; conduct oral argument with Justice Alomar on Order to show cause for pre-action disclosure and affidavit of service for same; review and accept calendar invitation from Court for adjourned appearance; correspondence with Roa's additional counsel, client, and JSF regarding status of appearance before Justice Alomar; calendar next appearance before Justice Alomar; conference with Clerk of the Court regarding proposed summons; prepare and resubmit single draft summons to Court via ECF; correspondence with Roa and client regarding appearance on Order to show cause; calendar deadline to oppose motion to dismiss; review reply correspondence from JSF regarding same; review ECF bounce from Court with amended summons issued; correspondence with process server regarding service of amended summons and first amended complaint; forward same to client, RFM, and JSF via email; review ECF bounce from opposing counsel with cover letter enclosing motion papers; correspondence with client requesting conference; conduct conference with client regarding status of case, discovery, and depositions; prepare and submit deposition notices to opposing counsel and Shalit via email with correspondence regarding same; review and revise deposition notice for Vito and resubmit same to opposing counsel and Shalit via email with correspondence regarding same; forward same to client, RFM, and JSF via email; conference with opposing counsel regarding depositions and extension request for completion of all fact discovery; log in to Relativity and review available documents. |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/6/2023 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with process server regarding service attempt on Liakas; review ECF bounce from Court with USDJ Order regarding Vito Gelardi's deadline to answer; correspondence with client regarding same; correspondence with opposing counsel regarding consent letter motion for extension of time; review voice message from opposing counsel regarding same; extensive correspondence with respect to language sought by us in consent letter motion; correspondence with opposing counsel regarding revised proposed scheduling Order; correspondence with opposing counsel and Shalit regarding consent to file letter motion for extension of time to complete discovery; review ECF bounce from opposing counsel with consent letter motion for extension of time to file answer on behalf of Vito Gelardi; review ECF bounce from opposing counsel with consent letter motion for extension of time to complete discovery; review ECF bounce from Court with USMJ Order granting consent letter motion for extension of time for Vito Gelardi to file answer; conference with client regarding issues with discovery extension and strategy; correspondence with JMK regarding provisional remedies. |
| 1/7/2023 | EK | 0.3 | \$325.00 | \$97.50 | Correspondence with JMK regarding research on provisional remedies; correspondence with Roa's additional counsel regarding documents from Stanulis, deposition start time, and advance notification of motion for sanctions for failure to appear; conference with client regarding strategy, discovery, depositions, and summary judgment. |
| 1/8/2023 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with client, private investigator, and JSF regarding Stanulis subpoena compliance and logistics; correspondence with client, Roa, RFM, and JSF regarding Liakas attempting to escape service; correspondence with process server regarding home address of Liakas; correspondence with client and [REDACTED]; extensive correspondence with Roa, client, and JSF regarding properties owned by Defendants (x6). |
| 1/9/2023 | EK | 0.4 | \$300.00 | \$120.00 | Extensive correspondence with process server regarding service attempts (x9); correspondence with Roa's additional counsel regarding response from Stanulis regarding deposition; correspondence with opposing counsel and Shalit regarding discovery; correspondence with [REDACTED] regarding expert witness; correspondence with client and JSF regarding [REDACTED]; review ECF bounce from Court with USMJ Order granting joint letter motion for extension of time to complete discovery; review voice message from opposing counsel. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/10/2023 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with client and JSF forwarding emails from process server regarding attempts at service (x3); forward to client, JSF, and private investigator correspondence with counsel for Stanulis; correspondence with clients regarding service; correspondence with process server regarding instructions for service; forward same to client via email; [REDACTED] correspondence with client and JSF regarding same; discussion with JSF regarding same; conference with opposing counsel regarding discovery and depositions; correspondence with forensic analyst and opposing counsel regarding release of batches two and three; correspondence with client regarding comparison of website; conference with client regarding strategy. |
| 1/11/2023 | JF | 0.3 | \$450.00 | \$135.00 | Interoffice meeting with E. Kataev; review emails |

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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/12/2023 | EK | 0.8 | \$300.00 | \$240.00 | Correspondence with client, Roa, [REDACTED] calendar and conduct virtual meeting with client, Roa, [REDACTED]; correspondence with client, Roa, JSF, and [REDACTED]; internal correspondence with JSF regarding same; correspondence with JSF regarding deposition of Safa; correspondence with forensic analyst and all counsel of record regarding release of batches two and three; correspondence with Roa's additional counsel, client, and private investigator regarding contempt motion against Stanulis; conference with private investigator regarding same; [REDACTED]; correspondence with client regarding same; correspondence with client regarding review of documents on Relativity; correspondence with process server regarding service attempts; correspondence with client regarding same; correspondence with JSF regarding evasive defendants; review correspondence from process server with affidavits of service (x4); correspondence with clients regarding same; correspondence with RFM regarding forensic examination. |
| 1/13/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence and conference with Shalit regarding motion to compel; correspondence with client regarding review of forensic production on Relativity; review voice message and correspondence from [REDACTED] regarding conference; correspondence with client forwarding emails from process server concerning service attempts (x3); compile affidavits of service and file same with Court via ECF; conference with process server regarding service attempts; extensive correspondence from process server regarding service attempts on Liakas (x7); correspondence with client regarding service-related issues; draft letter motion for extension of time to serve and for substitute service via email; file same with Court via ECF; [REDACTED]; correspondence and discussion with client regarding depositions; correspondence with RFM regarding status of forensic discovery; draft amended notice of deposition and serve same on opposing counsel and Shalit via email with correspondence regarding same; forward same to client, RFM, and JSF via email; correspondence with opposing counsel regarding depositions. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/14/2023 | EK | 0.3 | \$300.00 | \$90.00 | Correspondence with [REDACTED] regarding conference; [REDACTED]. |
| 1/15/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with opposing counsel and Shalit regarding depositions; forward same to clients, RFM, and JSF via email; conference with [REDACTED] regarding Defendants; [REDACTED]; correspondence and conference with client regarding same; correspondence with opposing counsel regarding telephonic meet-and-confer; forward same to client, RFM, and JSF via email; calendar telephonic meet-and-confer; correspondence with client regarding [REDACTED]. [REDACTED] file stipulation of voluntary dismissal with Court via ECF. |
| 1/16/2023 | EK | 0.4 | \$300.00 | \$120.00 | Calendar telephonic meet-and-confer with all counsel of record regarding depositions; review reply correspondence from client regarding same; review correspondence from process server regarding service attempts on Liakas (x2); extensive correspondence with client regarding hot documents from second batch; review same; correspondence with client regarding review of documents on Relativity; correspondence with process server regarding invoices; review correspondence from client with table of exhibits for hot documents; correspondence with client, Roa, JSF, [REDACTED]. |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/17/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with client regarding not documents; correspondence with client, Roa, JSF, and [REDACTED]; correspondence with Roa's additional counsel and process server regarding status of publication, cost quote for same, and alternatives; correspondence with Roa's additional counsel regarding same; correspondence with client regarding service by publication; correspondence with client regarding meet-and-confer; conduct telephonic meet-and-confer with opposing counsel and Shalit regarding depositions; correspondence with opposing counsel and Shalit regarding same; conference with client and Shalit regarding deposition scheduling; correspondence with opposing counsel and Shalit regarding same; conference and correspondence with client regarding text to be published for pre-action discovery lawsuit; correspondence with Roa's additional counsel and counsel for Stanulis regarding deposition; correspondence with Roa's additional counsel, client, and private investigator regarding motion to compel; correspondence with process server regarding invoices; extensive correspondence with client, Roa's additional counsel, Roa, and various newspapers regarding quote for publication; correspondence with client regarding same; correspondence with client regarding review of documents on Relativity; review correspondence from [REDACTED]; correspondence with client regarding Relativity issues; calendar and conduct virtual meeting with client to review search options in Relativity; correspondence with [REDACTED] regarding publication; correspondence with client regarding deposition questions to Safa; correspondence with client, Roa's additional counsel, and Roa regarding petition for relief from publication Order; conduct research regarding same; correspondence with client, Roa's additional counsel, and Roa regarding same; review ECF bounce from Court with USDJ Order dismissing Nicholas Elefterakis from case; correspondence with client and Roa regarding table of contents for responsive documents; correspondence with [REDACTED] client, and JSF regarding motion to amend caption; draft letter motion to amend caption; conduct research in support of same; finalize and file same with Court via ECF; update court docket and file; submit courtesy copy of same to [REDACTED] client, and JSF via email with correspondence regarding same; correspondence with Roa's additional counsel |
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IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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|-----------|----|-----|----------|----------|--|
| 1/18/2023 | EK | 0.8 | \$300.00 | \$240.00 | Correspondence with Roa's additional counsel, client, and private investigator regarding motion for contempt; review correspondence from Shalit with notice of deposition upon Defendants; correspondence with client, Roa, and Roa's additional counsel regarding service by publication; correspondence with client regarding review of documents on Relativity (x2); correspondence with client, Roa's additional counsel, and Roa regarding [REDACTED] service by publication; correspondence with process server regarding status of service by publication; correspondence with client, Roa, and Roa's additional counsel regarding relief from service by publication; correspondence with [REDACTED] and client regarding service by publication; amend notices of deposition for Safa and Vito; submit same via email to opposing counsel with correspondence regarding same; forward same to client via email; conference and extensive correspondence with opposing counsel regarding same; forward same to client via email; discussion with RFM regarding billing of process server invoices; correspondence with process server, RFM, MJM, and AG regarding payment of same; correspondence with Roa, client, RFM, and JSF regarding customer poached by Defendants; correspondence with client regarding completion of forensic review. |
| 1/19/2023 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with client regarding review and download of second and third batches in categories of hot documents, responsive documents, and non-responsive documents; review ECF bounce from Court with USDJ Order denying motion to amend caption; correspondence with accounting department regarding process server invoices paid; correspondence with [REDACTED], Roa's additional counsel, and Roa regarding service by publication; correspondence with Roa's additional counsel regarding motion for contempt. |
| 1/20/2023 | EK | 0.2 | \$300.00 | \$60.00 | Calendar deposition preparation with client; correspondence with client regarding video comparison between WatchDog and Companion; correspondence with client regarding document review on Relativity; correspondence with Roa, client, and JSF regarding spoliation of evidence; conference with client regarding case. |
| 1/21/2023 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with Roa, client, and JSF regarding spoliation issues; [REDACTED] correspondence with client and Roa regarding latest set of deposition questions; review ECF bounce from Court with USMJ Order regarding extension of time to serve Defendants; update calendared depositions of Safa and Vito. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/22/2023 | EK | 3.5 | \$300.00 | \$1,050.00 | Correspondence with client regarding review and download of second and third batches in categories of hot documents, responsive documents, and non-responsive documents; correspondence with Roa's additional counsel regarding motion for contempt; review reply correspondence from JSF regarding depositions (x2); correspondence with Roa and client regarding questions related to Safa's prior admissions; review correspondence from Google Drive (x3); conduct meeting with client to prepare for depositions; correspondence with court reporter regarding depositions [REDACTED] calendar deadline to serve Liakas; correspondence with process server regarding serving Liakas; calendar motion deadlines related to Defendants' motion to dismiss defamation cause of action; calendar reminder to draft opposition; correspondence with client regarding [REDACTED] [REDACTED] review documents with client on Relativity; conference with [REDACTED]; review reply correspondence from JSF regarding deadline to serve Liakas, Defendants' reply memorandum of law in further support of motion to dismiss defamation claim; and reminder to draft opposition papers thereto; download batch two hot documents and responsive documents, respectively; discussion and correspondence with client regarding request for certified records from NYS DOS; meeting with private investigator regarding review and revision of subpoena to NYS DOS Division of Licensing Services; finalize and submit same to Roa's additional counsel and client via email with correspondence regarding same; draft subpoena to Land Air Sea with private investigator; finalize and submit same to Roa's additional counsel and client via email with correspondence regarding same. |
| 1/23/2023 | JF | 1.7 | \$450.00 | \$765.00 | Conference with client to prepare for defendants' depositions |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/23/2023 | EK | 2 | \$300.00 | \$600.00 | Correspondence with all counsel of record regarding Defendants' responses to Roa's discovery demands; correspondence with Shalit regarding same; correspondence with private investigator regarding corrections to subpoena for LandAirSea; forward same to Roa's additional counsel via email; correspondence with process server regarding service on Liakas; correspondence with Roa's additional counsel regarding Stanulis and contract; forward same to private investigator via email; conference with private investigator regarding same; correspondence with newspaper regarding service by publication; correspondence with Roa's additional counsel and client regarding service of subpoenas; correspondence with Roa's additional counsel and client regarding filed subpoenas; correspondence with Roa's additional counsel and client regarding Stanulis' contempt; correspondence with client regarding virtual conference to prepare for deposition; calendar virtual meeting; conduct virtual meeting with client, Roa, and JSF regarding deposition preparation; correspondence with client and Roa regarding deposition questions; compile forensic batch two documents on Dropbox; submit same to client and Roa via email; calendar meeting with client regarding deposition preparation; correspondence with private investigator regarding [REDACTED]; correspondence with Roa and client regarding requests to NYS DOS. |
| 1/24/2023 | JF | 0.1 | \$450.00 | \$45.00 | Review PI's contract with Safa |
| 1/24/2023 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with process server regarding [REDACTED] Liakas; forward same to client and private investigator via email with correspondence regarding same; correspondence with client and private investigator, respectively, regarding same; conference with private investigator regarding same; correspondence and conference with client, Roa's additional counsel, JSF, and private investigator regarding procurement of Safa's contract with Stanulis; review voice message from Roa's additional counsel; discussion with JSF regarding motion for contempt; correspondence with client regarding responses from NYS DOS with other entities' certified records (x4); correspondence with client regarding same; correspondence and conference with private investigator regarding service on Liakas; correspondence with client regarding review of documents on Relativity. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/25/2023 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with forensic analyst regarding next batches and conference; forward same to client, RFM, and JSF via email; conference with private investigator regarding meeting; correspondence with client, Roa's additional counsel, and private investigator regarding same; correspondence with client, Roa's additional counsel, and private investigator regarding subpoenas; correspondence with [REDACTED] regarding price for service by publication; correspondence with client, Roa, and Roa's additional counsel regarding motion; correspondence with client and Roa regarding hot documents; correspondence with client, Roa, and Roa's additional counsel regarding [REDACTED] [REDACTED] correspondence and conference with private investigator regarding same; correspondence with Roa's additional counsel and client regarding service of subpoenas; correspondence with Roa's additional counsel and client regarding so Ordering subpoena to Land Air Sea; correspondence with client and Roa regarding tables of contents for responsive documents and hot documents, respectively; correspondence with process server regarding cleaning up Vito Gelardi recording; correspondence with Roa's additional counsel and client regarding Safa and Tom Brandon subpoenas. |
| 1/26/2023 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with Roa and client regarding subpoena to Verizon; correspondence with process server regarding [REDACTED] Liakas; correspondence with Roa, JSF, and client regarding Florida property; correspondence with forensic analyst regarding invoice; correspondence with client and Roa regarding discussion with [REDACTED] counsel; correspondence with client, Roa, and Roa's additional counsel regarding Defendants' IP addresses; correspondence with Roa's additional counsel, Roa, and client regarding investigation records; forward same to private investigator via email; conference with private investigator and client regarding same and strategy; correspondence with Roa's additional counsel and process server regarding request for service of subpoenas; correspondence and conference with private investigator regarding identity of individual who placed GPS puck on Roa's vehicle; correspondence with client regarding [REDACTED] correspondence with Roa's additional counsel, client, and private investigator regarding subpoenas to Safa and Tom; correspondence with private investigator regarding same and service on Tom. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/27/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with Roa's additional counsel, client, and private investigator regarding subpoenas; correspondence with Roa's additional counsel and process server concerning same [REDACTED]; forward same to client and private investigator via email; correspondence with private investigator regarding subpoena to Tom Brandon; correspondence with forensic analyst and all counsel of record regarding availability for call; correspondence with process server regarding service attempts on Liakas; review voice message from private investigator (x2); review correspondence from private investigator regarding same; correspondence with client, RFM, and JSF forwarding invoice from forensic analyst; correspondence with client regarding same; correspondence with Roa's additional counsel regarding subpoena to NYS DOS; correspondence with Roa's additional counsel regarding review of Order to show cause to extend time to publish. |
| 1/28/2023 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with client, RFM, and JSF regarding conference with forensic analyst and topics to address therein; correspondence with process server regarding service on Liakas; forward same to client and private investigator via email; extensive correspondence with private investigator regarding same; conference and correspondence with client regarding same; correspondence with client and private investigator regarding service of NYS DOS subpoena; calendar virtual meeting with client for deposition preparation; review reply correspondence from JSF regarding same; correspondence with private investigator regarding recording; review correspondence from NYS DOS rejecting certain requests for records; submit same to client via email with correspondence regarding same. |
| 1/29/2023 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with client, RFM, and opposing counsel regarding topics to discuss with forensic analyst and scheduling issues concerning same; correspondence with client regarding service of process on Liakas; correspondence with client regarding resubmission of requests to NYS DOS; correspondence with private investigator regarding service of process on Liakas and audio enhancement; conference and correspondence with Shalit regarding motion to compel and depositions. |
| 1/30/2023 | JF | 1.9 | \$450.00 | \$855.00 | Conference with client to prepare for depositions of defendants |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 1/30/2023 | EK | 2.3 | \$300.00 | \$690.00 | Correspondence with client regarding private investigator's tasks; forward same to private investigator via email; review correspondence from Teams regarding tasks; correspondence and conference with Shalit regarding letter motion to compel; correspondence with client regarding review of documents on Relativity; correspondence with client regarding ability to download native files outside of PDF; review correspondence from Relativity regarding download; correspondence with Roa's additional counsel and process server regarding subpoena to NYS DOS Division of Licensing Services in Roa action; conference with RFM regarding virtual meeting with client to prepare for depositions; correspondence with client, Roa, and JSF regarding deposition preparation; conduct virtual meeting with client, Roa, and JSF regarding same; correspondence with forensic analyst and opposing counsel regarding virtual meeting; discussion with client regarding same; correspondence with clients and JSF during virtual meeting regarding exhibits; correspondence with client regarding cross-reference of questions in outline; correspondence with process server regarding service on Liakas; review and accept calendar invitation from forensic analyst regarding virtual meeting. |
| 1/31/2023 | EK | 2.3 | \$300.00 | \$690.00 | Review correspondence from Teams regarding tasks; correspondence with client and JSF regarding supplemental declaration by Rosenblatt; correspondence with Shalit and Warner regarding Roa's motion to compel; correspondence with process server regarding service on Liakas; correspondence with client regarding same; correspondence with process server regarding next steps; correspondence with Roa, Roa's additional counsel, client, and JSF regarding service of complaint on Safa and Vito at deposition; correspondence with client and Roa regarding email from NYS DOS concerning V&S Holdings (x2); correspondence with client and Roa regarding email from NYS DOS concerning IME Guard Dog (x2); correspondence with client and Roa regarding email from NYS DOS concerning MedMal USA I LLC (x2); correspondence and discussion with client regarding IME Guard Dog filing and related facts; correspondence with counsel for Liakas regarding conference; forward same to client, RFM, and JSF via email; correspondence and conference with client regarding same; conduct meeting with client for deposition preparation; review documents on Relativity for same; calendar virtual meeting with forensic analyst; conduct virtual meeting with forensic analyst and opposing counsel; obtain documents from Relativity; correspondence with client and Roa [REDACTED] [REDACTED] correspondence with client regarding deletion analysis. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/1/2023 | EK | 2.8 | \$300.00 | \$840.00 | Correspondence with client regarding cross-reference of deposition outline against prior removed questions; review correspondence from Teams regarding tasks; correspondence with court reporter regarding deposition; correspondence with Roa's additional counsel and Court seeking adjournment of conference; review and accept calendar invitation for adjourned conference in pre-action disclosure case; calendar and conduct virtual meeting for deposition preparation with client; conference with client, Roa's additional counsel, and Roa regarding summons with notice against Safa, Vito, Companions, and Tom Brandon related to GPS device; correspondence with client regarding certified copies of corporate filings; update calendared deposition of Safa with virtual meeting link; amend notice of deposition for Vito and submit same to court reporter and all counsel of record via email; correspondence with court reporter and opposing counsel, respectively, regarding same; forward same to client via email; conference and correspondence with counsel for Elefterakis, Pollak, and Bridda regarding extension of time and meeting to discuss resolution; forward same to client, RFM, and JSF via email; correspondence with client, Roa, and Roa's additional counsel attaching summons with notice; review and revise same; submit same to client, Roa, and Roa's additional counsel via email with correspondence regarding same; correspondence with client, Roa, and Roa's additional counsel regarding filing of same sans subpoena; correspondence with client, Roa, and Roa's additional counsel attaching final filed summons with notice; review ECF bounce from Elefterakis, Pollak, and Bridda regarding extension of time to respond to amended complaint (x3); correspondence with client, Roa, and Roa's additional counsel attaching summons with notice containing index number, regarding service, and concerning notice of electronic filing; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED] correspondence with client and Roa regarding [REDACTED] update calendared deposition; prepare for deposition of Safa Abdulrahim Gelardi. |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/2/2023 | EK | 6 | \$300.00 | \$1,800.00 | Review ECF bounce from Court with USMJ Order granting counsel for Elefterakis, Pollak, and Bridda extension of time to respond to amended complaint; correspondence with court reporter regarding and client depositions; review documents on Relativity related to deposition preparation; correspondence with client regarding Relativity; correspondence and conference with USDJ Chen chambers regarding deposition dispute; correspondence and conference with USMJ Cho chambers regarding deposition dispute; correspondence with RFM regarding deposition; conduct oral argument with USMJ Cho regarding whether Safa can wear a mask; review ECF bounce from Court with USMJ minute entry for proceedings held during deposition dispute; conduct deposition of Safa; review correspondence from process server regarding affidavit of non-service for Liakas (x3); correspondence with client regarding exhibit for deposition (x2); update calendared deposition of Vito; correspondence with Roa regarding service of summons with notice on Safa and Vito; correspondence with court reporter and all counsel of record regarding deposition location for tomorrow; draft affidavits of service in Roa action against Safa, Vito, Companions, and Tom Brandon; submit same to SF and Roa's additional counsel via email with correspondence regarding same. |
| 2/2/2023 | JF | 9.5 | \$450.00 | \$4,275.00 | Attend S. Gelardi's deposition |
| 2/3/2023 | JF | 0.3 | \$450.00 | \$135.00 | Research 5th amendment and e-mail correspondence with client regarding same |
| 2/3/2023 | EK | 4.6 | \$300.00 | \$1,380.00 | Correspondence with client regarding exhibit for deposition tomorrow; correspondence with Shalit regarding resolution of letter motion to compel discovery; correspondence with Roa, client, and JSF regarding deposition notes; correspondence with JSF and client regarding research on Fifth Amendment privilege and waiver; correspondence with client and Roa regarding exhibits (x3); correspondence with SF attaching affidavits of service; forward same to Roa's additional counsel; correspondence with client regarding document review on Relativity; correspondence with USMJ Cho and all counsel of record regarding deposition dispute; conduct oral argument before USMJ Cho on additional time necessary to depose Safa; review ECF bounce from Court with USMJ minute entry for proceedings held regarding deposition dispute; continue to conduct deposition of Safa; correspondence with court reporter regarding recording played during deposition. |
| 2/3/2023 | JF | 6.5 | \$450.00 | \$2,925.00 | Appear for S. Gelardi's deposition |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/5/2023 | EK | 2.7 | \$300.00 | \$810.00 | <p>Review correspondence from Teams regarding tasks; correspondence with court reporter regarding assignment and billing; correspondence with Roa's additional counsel, Roa, client, and private investigator regarding service of subpoena upon Thomas Brandon; update calendared oral argument for Order to show cause; conference with private investigator regarding Thomas Brandon; correspondence with private investigator, client, and Roa's additional counsel regarding and attaching subpoena to Thomas Brandon with instructions concerning same and requests for information from Roa's additional counsel; correspondence with client, private investigator, and Roa's additional counsel with request to amend and refile subpoena prior to service; update calendared deposition of Vito to continued deposition of Safa; calendar deadline for Elefterakis, Pollak, and Bridda to respond to complaint; review reply correspondence from JSF regarding same; correspondence with RFM, JSF, and JML regarding deposition; correspondence with Roa's additional counsel, client, and private investigator regarding propriety of service of subpoena; extensive correspondence with Roa's additional counsel, Roa, client, and private investigator [REDACTED]</p> <p>correspondence and conference with private investigator regarding same; review Defendants' motion to dismiss defamation claim; review documents on Relativity to find defamatory statements; draft and prepare proposed second amended complaint bolstering defamation claim, notice of cross-motion, and declaration in support of cross-motion; begin drafting memorandum of law in opposition to motion and in support of cross-motion; conduct legal research regarding same; continue drafting memorandum of law.</p> |
| 2/6/2023 | JF | 2.7 | \$450.00 | \$1,215.00 | Review and revise opposition to motion to dismiss defamation claim |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/6/2023 | EK | 3.2 | \$300.00 | \$960.00 | Continue drafting memorandum of law in opposition to motion to dismiss cause of action for defamation; finalize and submit same with notice of cross-motion, declaration in support, and proposed amended pleading to JSF via email with correspondence regarding same; correspondence with JSF regarding same; review correspondence from JSF with revisions to memorandum of law in opposition; correspondence with JSF regarding strategy [REDACTED]; review and further revise memorandum of law; review correspondence from JSF with further revised proposed second amended complaint; review and further revise same; correspondence with court reporter regarding transcript and video; review correspondence from Teams regarding tasks; review correspondence from client regarding task list; submit further revised and related motion papers to client, RFM, and JSF via email with correspondence regarding same and strategy; review reply correspondence from JSF with further revised memorandum of law in opposition; correspondence with client regarding revisions to papers; review and revise declaration; submit same to client via email with correspondence regarding same and requested revision; review, revise, and finalize memorandum of law in opposition; correspondence and discussion with SF regarding tables of contents & authorities for same; correspondence and conference with client regarding standard of review and submission of final draft; correspondence with SF attaching final draft with tables; review, revise, and finalize memorandum of law, declaration of Kataev, and notice of cross-motion; compile exhibits, prepare cover letter; submit same to all counsel of record via email with correspondence regarding same; forward same to client, RFM, and JSF via email; submit cover letter to Court via ECF. |
| 2/7/2023 | EK | 0.2 | \$300.00 | \$60.00 | Review correspondence from forensic analyst regarding Kiteworks account; extensive correspondence with client, Roa, Roa's additional counsel, and private investigator regarding service on Thomas Brandon and details regarding Brandon; review correspondence from Teams regarding tasks; correspondence with client regarding subpoena to Defendants' accountant; correspondence with [REDACTED] regarding expert engagement. |
| 2/8/2023 | EK | 0.2 | \$300.00 | \$60.00 | Conference and correspondence with client regarding case status, next steps, and deposition transcript; correspondence with Roa's additional counsel, Roa, and client regarding strategy concerning pre-action disclosure case; correspondence with Shalit and opposing counsel regarding discovery; correspondence with Shalit regarding same; correspondence and conference with client regarding exhibit list from deposition; correspondence with process server regarding affidavit of service on Liakas (x2). |
| 2/9/2023 | JF | 0.2 | \$450.00 | \$90.00 | Read pre-motion conference letter; e-mail correspondence with E. Kataev |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/9/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with client regarding need to subpoena [REDACTED] correspondence with Roa's additional counsel regarding motion pre-action disclosure case; conduct oral argument on pre-action disclosure case; calendar virtual meeting with Roa's additional counsel; conduct virtual meeting with Roa's additional counsel to prepare proposed Order; submit same to client and Roa's additional counsel via email with correspondence regarding same; correspondence with client and Roa's additional counsel regarding same; correspondence with Roa's additional counsel regarding cover letter enclosing same; correspondence with Roa and client regarding [REDACTED]; review ECF bounce from Elefterakis, Pollak, and Bridda regarding letter motion for pre-motion conference; correspondence and discussion with JSF regarding same; correspondence with court reporter and client regarding transcript; correspondence with client regarding discussion with Elefterakis, Pollak, and Bridda regarding meeting; correspondence and conference with client regarding deposition exhibits; correspondence with Roa, JSF, and client regarding Defendants' plagiarized reports from client; file summons returned executed for Liakas; correspondence with process server regarding invoices; correspondence with Roa's additional counsel regarding submission of proposed Order to Justice Alomar; review correspondence from Roa's additional counsel to Court with filed cover letter and proposed Order; correspondence with opposing counsel regarding enlargement of page limit for reply in further support of motion to dismiss and in opposition to cross-motion; conference with client regarding next steps; correspondence with counsel for Liakas regarding [REDACTED] forward same to client and JSF via email. |
| 2/10/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with client, Roa's additional counsel, and JSF regarding submission of letter to Court with proposed Order in pre-action disclosure case; correspondence with opposing counsel regarding consent to enlargement of page limit on condition that Plaintiff's deadline to file and serve a reply in further support of its cross-motion be extended; forward same to client and JSF via email; review voice message and correspondence from counsel for Liakas [REDACTED]; conference with client regarding various items; correspondence with client regarding deposition exhibits; correspondence with forensic analyst and all counsel of record regarding production of text messages; forward same to client and JSF via email; correspondence and conference with client regarding same; conference and correspondence with client regarding submission to counsel for Elefterakis, Pollak, and Bridda regarding settlement. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/12/2023 | EK | 1.6 | \$300.00 | \$480.00 | <p>Review correspondence from Teams regarding tasks; conference and correspondence with client regarding Order to show cause to renew motion for preliminary injunction and sanctions; correspondence with Roa's additional counsel, client, and JSF regarding submission of Word version of proposed Order to to court in pre-action disclosure case; [REDACTED]</p> <p>[REDACTED] forward same to client and JSF via email; correspondence with forensic analyst and all counsel of record regarding text messages and production of [REDACTED]</p> <p>[REDACTED] forward same to client, RFM, and JSF via email; correspondence with client and JSF regarding [REDACTED] conduct document review on Relativity for preparation of correspondence to counsel for Elefterakis, Pollak, and Bridda; correspondence with client regarding virtual meeting to prepare for same; calendar and conduct virtual meeting with client to review documents; compile exhibits and highlight same; prepare proposed correspondence to counsel for Elefterakis, Pollak, and Bridda and submit same to client and JSF via email with correspondence regarding same; correspondence with client and JSF, respectively, regarding same; correspondence with court reporter regarding transcript.</p> |
| 2/13/2023 | JF | 0.3 | \$450.00 | \$135.00 | Review client's outline for motion for preliminary injunction |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/13/2023 | EK | 0.8 | \$300.00 | \$240.00 | Review correspondence from Teams regarding tasks; correspondence and conference with counsel for Liakas; review correspondence from process server with updated invoice; review correspondence from court reporter with deposition transcripts (x2); conference and correspondence with client regarding [REDACTED] to counsel for Elefterakis, Pollak, and Bridda; correspondence with forensic analyst and opposing counsel regarding forensic production issues; forward same to client, RFM, and JSF via email; conduct document review on Relativity; finalize and submit email to counsel for Elefterakis, Pollak, and Bridda with copy to RFM and JSF; forward same to client via email; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding meeting; forward same to client and JSF via email; correspondence with client regarding same; review correspondence from JSF regarding comments to outline for Order to show cause; correspondence with client and court reporter regarding video of deposition; correspondence with court reporter regarding exhibit and transcript; review correspondence from Roa's additional counsel to Court in pre-action disclosure case attaching Word version of proposed Order; conference with private investigator regarding efforts related to Thomas Brandon; correspondence with Shalit and opposing counsel regarding joint letter related to Roa's motion to compel discovery; correspondence with client regarding [REDACTED] [REDACTED] for Elefterakis, Pollak, and Bridda; conference with client regarding recording from private investigator; correspondence with private investigator regarding same and criminal record of Thomas Brandon; correspondence with client and JSF regarding summary of deposition exhibits; extensive correspondence with client regarding text messages from forensic examiner. |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/14/2023 | EK | 0.4 | \$300.00 | \$120.00 | Review correspondence from Teams regarding tasks; [REDACTED] [REDACTED] review voice message and correspondence from counsel for Liakas regarding conference; conference with client regarding motion; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED] forward same to client via email; correspondence with client regarding same; correspondence with client regarding deposition exhibits; correspondence with client forwarding email from Roa's additional counsel to Court in state court pre-action disclosure case with Word version of proposed Order; conference with client regarding text messages from forensic analyst; correspondence with forensic analyst and opposing counsel regarding same; forward same to client and JSF via email; correspondence with Shalit regarding [REDACTED]; review correspondence from counsel for Elefterakis, Pollak, and Bridda with [REDACTED]; forward same to client and JSF via email with correspondence regarding same; correspondence with client and JSF regarding same; conference with client regarding same; review correspondence from forensic analyst with compilation of all non-responsive documents. |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/15/2023 | EK | 2.5 | \$300.00 | \$750.00 | Correspondence and conference with client regarding availability to meet with both sets of remaining Defendants; review and revise stipulation with Elefterakis, Pollak, and Bridda; submit same to counsel for Elefterakis, Pollak, and Bridda, RFM, and JSF via email with correspondence regarding same; forward same to client and JSF via email; correspondence with counsel for Liakas concerning [REDACTED] forward same to client, RFM, and JSF via email with correspondence regarding same; [REDACTED] correspondence with forensic analyst and all counsel of record regarding forensic production; review correspondence from Teams regarding tasks; conference with Shalit regarding [REDACTED] conduct research on preclusion of sale of property; print, sign, scan, and send fully executed stipulation to counsel for Elefterakis, Pollak, and Bridda via email with correspondence regarding same; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding content of letter to Court submitting stipulation; review ECF bounce from Elefterakis, Pollak, and Bridda with motion for extension of time and to withdraw letter motion for pre-motion conference; draft proposed Order to show cause for contempt; submit same to client, RFM, and JSF via email; meeting with private investigator regarding Thomas Brandon; conduct criminal history record search on Brandon; forward same to private investigator, client, and JSF via email; begin drafting memorandum of law in support of Order to show cause for sanctions; correspondence with client regarding [REDACTED] [REDACTED] correspondence with client and Roa regarding phone records; correspondence with client regarding revisions to motion papers; correspondence with private investigator regarding other criminal history search results; forward same to client and JSF via email; review ECF bounce from Court with USDJ Order granting extension of time to Elefterakis, Pollak, and Bridda and withdrawing letter motion for pre-motion conference; conduct research in support of Order to show cause for contempt; continue drafting memorandum of law in support of same; submit draft to client and JSF via email with correspondence regarding same; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED] forward same to client and JSF via email; correspondence with client regarding revisions to memorandum of |
| 2/16/2023 | JF | 0.5 | \$450.00 | \$225.00 | Review and revise OSC |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/16/2023 | EK | 0.6 | \$300.00 | \$180.00 | Review ECF bounces from opposing counsel for Liakas with notice of appearance and extension of time to respond to complaint; review correspondence from counsel for Liakas regarding [REDACTED] correspondence with opposing counsel for Elefterakis, Pollak, and Bridda regarding meeting; review ECF bounce from Court with USMJ Order granting Liakas' motion for extension of time to respond to complaint; review correspondence from JSF with revised proposed Order to show cause; correspondence with client, JSF, and Roa regarding timeline and request for various exhibits; correspondence with client and JSF regarding strategy concerning Order to show cause; correspondence and conference with client regarding text message production by forensic analyst; correspondence with opposing counsel regarding privilege log; forward same to client and JSF via email; correspondence with client regarding same; correspondence with Roa's additional counsel, Roa, and client regarding signed Order by Justice Alomar in pre-action disclosure case and demand for complaint in separate state court complaint; provide Roa's additional counsel regarding service of Order via reply email. |
| 2/17/2023 | EK | 0.2 | \$300.00 | \$60.00 | Review correspondence from JSF to client with revisions to memorandum of law in support of Order to show cause for sanctions; correspondence with client and JSF regarding motion for summary judgment; review correspondence from court reporter with video link (x2); forward same to client and JSF via email (x2); conference with client regarding case. |
| 2/17/2023 | JF | 0.4 | \$450.00 | \$180.00 | Review and revise MOL in support of renewed OSC |
| 2/18/2023 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with Roa, client, and JSF regarding Florida property; correspondence with JSF regarding revisions to memorandum of law in support of Order to show cause for contempt; conference with client regarding contempt motion; draft declaration of Roa in support of Order to show cause for contempt. |
| 2/19/2023 | EK | 1.3 | \$300.00 | \$390.00 | Correspondence with client regarding Order to show cause; draft declaration of Roa in support of same; submit same to client, Roa, RFM, and JSF via email with correspondence regarding same. |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/20/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with Roa, client, JSF, and RFM regarding Roa's revisions to declaration; review correspondence from Teams regarding tasks; correspondence with client regarding Safa's perjury (x3); correspondence with opposing counsel regarding reply papers in further support of motion to dismiss cause of action for defamation and memorandum of law in opposition to our cross-motion for leave to amend the pleadings together with cover letter; correspondence with opposing counsel regarding logistics concerning filing of same; correspondence with opposing counsel regarding additional revisions to proposed amended complaint; review correspondence from client with revisions to Roa declaration; review ECF bounce from opposing counsel with cover letter concerning reply papers; conference and correspondence with client regarding same and status of case as well as Order to show cause. |
| 2/21/2023 | EK | 0.4 | \$300.00 | \$120.00 | Review correspondence from Teams regarding tasks; correspondence with Roa's additional counsel, Roa, and client regarding Stanulis; review ECF bounce from opposing counsel with motion to dismiss cause of action for defamation; review and further revise proposed Second Amended Complaint; correspondence with all counsel of record regarding same; file notice of motion, memorandum of law in opposition to motion to dismiss and in support of cross-motion for leave to amend, and declaration in opposition to motion to dismiss and in support of cross-motion for leave to amend with accompanying exhibits, respectively, with Court via ECF; review ECF bounces from opposing counsel with reply memorandum of law in further support of motion to dismiss and with memorandum of law in opposition to cross-motion for leave to amend; review correspondence from Roa to Novofastovsky and client regarding suit; continue revising declaration of Roa in support of Order to show cause for contempt. |
| 2/22/2023 | EK | 0.1 | \$300.00 | \$30.00 | Review correspondence from Teams regarding tasks; correspondence with client, JSF, and RFM regarding [REDACTED]; correspondence with client regarding production of text messages by forensic analyst and subpoena to [REDACTED]; correspondence with court reporter regarding billing (x2). |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/23/2023 | EK | 0.6 | \$300.00 | \$180.00 | Review correspondence from Teams regarding tasks; correspondence and conference with client regarding text messages; correspondence with all counsel of record and forensic analyst regarding production of same; forward same to client via email; review automatic reply correspondence from opposing counsel; correspondence with client forwarding invoices from court reporter (x2); correspondence with Roa's additional counsel, Roa, and client regarding [REDACTED] subpoena by NYS DOS Division of Licensing Services; correspondence with JMK, Roa's additional counsel, Roa, and client regarding same; correspondence with forensic analyst and all counsel of record regarding text message production; forward same to client via email; review correspondence from Roa's counsel to opposing counsel regarding discovery; extensive correspondence with forensic analyst regarding production of text messages; forward same to client via email with correspondence regarding same; download text messages and unzip same. |
| 2/24/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with clients regarding production of text messages; complete unzipping of files and place same in Dropbox; submit link of same to clients, RFM, and JSF via email with correspondence regarding same; correspondence with Roa's additional counsel, Roa, client, and JMK regarding so-Ordered subpoena; correspondence with Roa's additional counsel, Roa, client, and JMK regarding FOIL request and subpoena; extensive correspondence with Roa's additional counsel, Roa, client, and private investigator regarding questions to Stanulis for affidavit; correspondence and conference with private investigator regarding same. |
| 2/25/2023 | EK | 0.5 | \$300.00 | \$150.00 | Conference with client regarding status, motions, and meetings; correspondence with counsel for Liakas regarding [REDACTED]; forward same to client, RFM, and JSF; review automatic reply correspondence from counsel for Liakas; forward same to client, RFM, and JSF; prepare February 14 Upload documents and submit same to client via email; correspondence with private investigator and client forwarding e-mail from Roa's additional counsel concerning subpoena to NYS DOS Division of Licensing Services; correspondence with Roa's additional counsel, Roa, client, and private investigator regarding questions for Stanulis in preparation of affidavit; correspondence with private investigator forwarding client's questions for same. |
| 2/26/2023 | EK | 1.7 | \$300.00 | \$510.00 | Review correspondence from Teams regarding tasks; conference with client regarding action items; extensive correspondence with Roa's additional counsel, Roa, private investigator, and client regarding questions to Stanulis and subpoena to Division of Licensing Services; conference with Roa, private investigator, and client - respectively - regarding same; update calendared discovery deadlines and conference (x5); review reply correspondence from JSF regarding same (x5); draft reply memorandum of law in further support of cross-motion for leave to amend complaint. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 2/27/2023 | EK | 1.5 | \$300.00 | \$450.00 | Continue drafting reply memorandum of law in further support of cross-motion for leave to amend the complaint; submit same to client and JSF via email with correspondence regarding same; review correspondence from Teams regarding tasks; review correspondence from Roa's counsel to opposing counsel regarding discovery; correspondence and conference with client regarding additional arguments to address in reply memorandum of law; correspondence with forensic analyst and all counsel of record regarding forensic search of all text messages; forward same to client and JSF via email; extensive correspondence with counsel for Liakas regarding [REDACTED] extensive correspondence and conference with client regarding same; review voice message from client; review correspondence from JSF with revisions to reply memorandum of law; review and further revise reply memorandum of law; conduct research regarding same; finalize and submit reply memorandum of law to client, JSF, and PS (for tables) via email with correspondence regarding same; extensive correspondence with client regarding same; correspondence with PS regarding reply memorandum of law with tables of contents and authorities completed; correspondence with client regarding various tasks; discussion and correspondence with JSF regarding final review of reply memorandum of law; review reply correspondence from JSF with final revisions to reply memorandum of law; finalize and file same with Court via ECF; calendar meeting with Liakas. |
| 2/27/2023 | JF | 1.7 | \$450.00 | \$765.00 | Review and revise reply brief; revise renewed motion for preliminary injunction |
| 2/28/2023 | EK | 0.2 | \$300.00 | \$60.00 | Review correspondence from Teams regarding tasks; [REDACTED] correspondence with Roa's counsel and opposing counsel regarding discovery and motion to compel; correspondence with private investigator regarding NYS DOS subpoena; review correspondence from client with summary of text messages; correspondence with client and JSF regarding strategy concerning same and regarding missing texts; conference with client regarding case. |
| 2/28/2023 | JF | 0.3 | \$450.00 | \$135.00 | Review summary of text messages |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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| 3/1/2023 | EK | 0.6 | \$300.00 | \$180.00 | Correspondence with counsel for Liakas regarding [REDACTED]; correspondence with private investigator providing subpoena; correspondence with Roa, client, and JSF regarding missing communications between Safa and Adam and strategy points concerning same; review correspondence from Teams regarding tasks; correspondence with Roa's counsel and opposing counsel regarding discovery; conference and correspondence with client regarding draft affidavit by Stanulis; review and revise same during conference; submit same to client and JSF via email with correspondence regarding same; correspondence with client and JSF regarding same; correspondence with Roa's additional counsel, Roa, and client regarding same; forward same to JSF via email; correspondence with JSF regarding same; correspondence with counsel for Liakas regarding [REDACTED]; forward same to client and JSF via email; extensive correspondence with client and JSF regarding viability of [REDACTED]. |
| 3/2/2023 | EK | 2 | \$- | \$- | Travel time. |
| 3/2/2023 | EK | 2.5 | \$300.00 | \$750.00 | Conduct research regarding prejudgment attachment; extensive correspondence with client and JSF regarding same; conference with client regarding same and [REDACTED]; forward same to client via email; correspondence with client regarding same; conference with client regarding [REDACTED]; review ECF bounce from Roa's counsel with letter motion to compel discovery; correspondence with Roa and his counsel regarding [REDACTED]; review ECF bounce from Court with USMJ Order regarding deadline for Defendants to respond to Roa's letter motion to compel discovery. |
| 3/2/2023 | JF | 3.2 | \$450.00 | \$1,440.00 | Conference call with client; draft motion for attachment |
| 3/3/2023 | EK | 0.2 | \$300.00 | \$60.00 | Correspondence with JSF regarding revisions to proposed Order to show cause; extensive correspondence with Roa and his counsel regarding civil contempt motion; correspondence with JSF and client regarding revisions to memorandum of law in support of proposed Order to show cause; review correspondence from client with revisions to same; conduct research regarding aiding and abetting breach of duty of loyalty and whether the underlying tort is required to pursue same. |
| 3/3/2023 | JF | 1.5 | \$450.00 | \$675.00 | Draft motion for attachment |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/4/2023 | EK | 0.5 | \$300.00 | \$150.00 | Correspondence with client and JSF regarding [REDACTED] correspondence with client and JSF regarding arguments in support of motion for prejudgment attachment; correspondence with Roa, his counsel, and client regarding response to [REDACTED]; correspondence with Roa, his counsel, and client regarding motion and separate action; correspondence with RFM, JSF, counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED] forward same to client via email; correspondence with Roa and his counsel regarding contempt motion strategy. |
| 3/5/2023 | EK | 0.1 | \$300.00 | \$30.00 | Correspondence with Roa and his counsel regarding Order to show cause for contempt. |
| 3/6/2023 | JF | 0.4 | \$450.00 | \$180.00 | Review slanderous mailings; interoffice meeting with E. Kataev regarding same |
| 3/6/2023 | EK | 2.5 | \$300.00 | \$750.00 | Review correspondence from Teams regarding tasks; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED]; forward same to client via email; correspondence with client regarding receipt by customers of anonymous slanderous package; extensive correspondence with client, Roa, and JSF regarding and attaching same with strategy to address same; conference with client regarding same; review ECF bounce from Court with notice of filing of official transcript; extensive correspondence and discussion with client regarding May 13, 2022 Order; meeting with client to prepare motion papers; correspondence with forensic analyst and all counsel of record regarding text message production, applications on cellular phones, and IP addresses; forward same to client and JSF via email; review automatic reply correspondence from forensic analyst; correspondence with client regarding revisions to declaration of Roa; submit same to client, Roa, and JSF via email with correspondence regarding same; review reply correspondence from client with revisions to declaration of Roa; correspondence with client regarding draft subpoena to [REDACTED] correspondence with client and Roa regarding revisions to motion papers; review and revise memorandum of law with client during meeting; submit same to client, Roa, and JSF via email with correspondence regarding same. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/7/2023 | EK | 0.7 | \$300.00 | \$210.00 | Review correspondence from client with revised memorandum of law (x2); review correspondence from client forwarding email from recipient of libelous submission; review correspondence from JSF with further revised memorandum of law; extensive correspondence and conference with client regarding strategy; calendar and conduct virtual meeting with client and JSF regarding same; extensive correspondence with client and JSF regarding libelous emails; review correspondence from JSF regarding Google subpoena; review correspondence from client with further revised memorandum of law (x3); review correspondence from Roa with revised declaration in support; review correspondence from client with further revised declaration in support; correspondence with client regarding text message exhibits; correspondence with Roa, client, and JSF regarding exhibits; extensive correspondence with client, Roa, and JSF regarding strategy concerning Zieher, Stanulis affidavit, and [REDACTED] |
| 3/7/2023 | JF | 1.2 | \$450.00 | \$540.00 | Review and revise renewed motion for injunction; conference with client and E. Kataev regarding defamatory letters |
| 3/8/2023 | JF | 1.6 | \$450.00 | \$720.00 | Review and revise memorandum of law in support of renewed motion for injunction |
| 3/8/2023 | EK | 2.6 | \$300.00 | \$780.00 | Correspondence with client, Roa, and JSF regarding text messages and exhibit; review and revise Roa's declaration in support; submit same with all accompanying exhibits to client, Roa, and JSF via email with correspondence regarding same; review reply correspondence from client with revisions to same; review and revise memorandum of law in support; submit same to client, RFM, and JSF via email; correspondence with client regarding revisions to be made to same; correspondence with [REDACTED]; forward same to client and JSF via email; correspondence with client and JSF regarding same; correspondence with client and JSF regarding demand for additional relief; correspondence with Roa's counsel, Roa, and client regarding affidavit from Stanulis with exhibits; correspondence with client, JSF, and Roa regarding additional facts to include in motion; review correspondence from JSF with further revised memorandum of law; extensive correspondence with counsel for Elefterakis, Pollak, and Brida regarding [REDACTED] extensive correspondence with client regarding same; [REDACTED]; review reply correspondence from JSF regarding same; correspondence with counsel for Liakas regarding [REDACTED] forward same to client, RFM, and JSF regarding same; correspondence with client regarding highlighted text messages exhibit; correspondence with client, Roa, and JSF regarding research in support of shifting full costs of additional forensic examination due to bad faith conduct; correspondence with client regarding subpoena strategy. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/9/2023 | JF | 1.2 | \$450.00 | \$540.00 | Review and revise memorandum of law in support of renewed injunction and declarations |
| 3/9/2023 | EK | 2.8 | \$300.00 | \$840.00 | Correspondence with client, Roa, and JSF regarding case law in support of forensic examination at Defendants' cost for bad faith conduct; correspondence with client, Roa, RFM, and JSF regarding exhibits for motion; correspondence with client regarding [REDACTED] [REDACTED] correspondence with JSF regarding Stanulis affidavit; correspondence with counsel for Roa, Roa, and client regarding same; review and revise memorandum of law in support; review and revise Roa declaration in support; submit both to client and JSF via email with correspondence regarding same; draft declaration of Levi in support; draft declaration of Kataev in support; submit both to client and JSF via email with correspondence regarding same; extensive correspondence with client regarding revisions to motion; review correspondence from client with revised memorandum of law; correspondence with client regarding declarations; review correspondence from JSF with further revised memorandum of law; correspondence with Roa, client, JSF, and RFM regarding strategy and revisions to papers; correspondence with JSF regarding review of declarations; review correspondence from JSF with revised Levi declaration; correspondence with JSF regarding same; review correspondence from JSF with revised Kataev declaration; correspondence with JSF regarding same; review correspondence from JSF with revised Roa declaration; correspondence with counsel for Liakas regarding [REDACTED] [REDACTED] extensive correspondence with opposing counsel, Roa's counsel, and counsel for Elefterakis, Pollak and Bridda regarding production of documents; review ECF bounce from opposing counsel with letter response in opposition to Roa's letter motion to compel; conference with client regarding preparation of exhibit; extensive correspondence with client regarding same; review correspondence from client with revised memorandum of law; review and revise same as well as declarations of Roa, Levi, and Kataev; extensive correspondence with client regarding execution of declaration; correspondence and conference with client regarding [REDACTED]; review and revise memorandum of law in support; submit same to client, Roa, and JSF via email with correspondence regarding same; review and revise declaration of Roa; submit same with executed Levi declaration to client, Roa, and JSF via email with correspondence regarding same; review |
| 3/10/2023 | JF | 1.2 | \$450.00 | \$540.00 | Final revisions to memorandum of law and declarations in support of renewed motion for injunction; review order; e-mail correspondence with E. Kataev regarding same |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/10/2023 | EK | 2.5 | \$300.00 | \$750.00 | Correspondence with JSF regarding final review of motion papers; correspondence with SF and JSF regarding tables of contents and authorities; review correspondence from JSF with revisions to memorandum of law; correspondence with JSF regarding declarations and request for hearing; correspondence with counsel for Liakas regarding [REDACTED]; forward same to client, RFM, and JSF via email; correspondence with client and JSF forwarding document responses from opposing counsel (x3); review, revise, and finalize memorandum of law; submit same via email to SF, client, and JSF with correspondence regarding tables of contents & authorities; correspondence with client regarding strategy; correspondence with client regarding Roa declaration; discussion and correspondence with SF regarding final memorandum of law with tables; calendar and conduct virtual meeting regarding finalizing exhibits and revising memorandum of law with pin citations; conduct review of forensic evidence on Relativity; finalize and file proposed Order to show cause for temporary restraining Order, preliminary & permanent injunction, contempt, hearing, attorneys' fees, and prejudgment attachment; correspondence with JSF regarding same; finalize and file memorandum of law in support of same; finalize and file declaration of Roa in support with accompanying exhibits A through G; finalize and file declaration of Kataev in support with accompanying exhibits A through F; finalize and file declaration of Levi in support; update court docket and file; correspondence with all counsel of record providing courtesy copy of submission; review bounce-back e-mail from counsel for Elefterakis, Pollak, and Bridida; review ECF bounce from Court with USDJ Order granting motion for hearing and temporary restraining Order; forward same to RFM via email with correspondence regarding same [REDACTED]; correspondence with private investigator regarding USDJ Order; correspondence with MJM and MCM regarding same attaching copy of memorandum of law; correspondence with JSF, RFM, RIM, and JML regarding victory. |
| 3/11/2023 | EK | 0.2 | \$300.00 | \$60.00 | Calendar meeting with [REDACTED]; correspondence with JML, RFM, JSF, and RIM regarding victory; review ECF bounce from Court with USDJ Order granting temporary restraining Order; correspondence with client regarding meeting and hearing preparation. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/12/2023 | EK | 2 | \$300.00 | \$600.00 | Correspondence with client regarding case; calendar hearing and motion submission deadlines; correspondence with JSF, RFM, RIM, and JML regarding victory; review reply correspondence from Roa's counsel regarding hearing; review reply correspondence from JSF regarding calendared hearing and deadlines; correspondence with Roa, client, and JSF regarding Defendants' properties for sale; meeting and correspondence with client and Roa to prepare subpoenas; finalize subpoenas to Vito, Safa, Five Pillars, Lumina, Google, GoDaddy, Mark Purificati, and Tiffany Uribe and submit same to all counsel of record via email; forward same to client, private investigator, RFM, and JSF via email; correspondence with client regarding [REDACTED] [REDACTED] correspondence with Roa and private investigator regarding subpoenaed recordings; extensive correspondence and conference with private investigator regarding hearing and related matters; prepare subpoenas for Brandon, Pollak, Bridda, Elefterakis, and Land Air Sea Systems; prepare addendum for Land Air Sea Systems. |
| 3/13/2023 | JF | 0.9 | \$450.00 | \$405.00 | Interoffice meeting with E. Kataev; conference calls with M. Wiener and J. Valentino; [REDACTED] |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/13/2023 | EK | 2.2 | \$300.00 | \$660.00 | <p>Correspondence with all counsel of record regarding additional subpoenas; extensive correspondence with process server, client, and JSF regarding service of all subpoenas; correspondence with client and JSF regarding private investigator and related issues for hearing; extensive correspondence with private investigator regarding billing; review correspondence from PayPal regarding invoice from private investigator; correspondence with Roa, private investigator, and client regarding subpoena to Land Air Sea; correspondence and conference with RFM regarding temporary restraining Order and hearing; correspondence with client regarding service of subpoena on Elefterakis; correspondence and discussion with JSF regarding text of injunction; correspondence and discussion with JSF regarding [REDACTED]</p> <p>[REDACTED] review ECF bounce from Court with USMJ Order regarding discovery motion (x2); extensive correspondence and conference with counsel for Elefterakis, Pollak, and Bridda regarding subpoenas, [REDACTED]; correspondence with client, RFM, JSF, and private investigator regarding so Ordering Google subpoena; extensive correspondence with client and JSF regarding same; correspondence with process server regarding service upon Pollak; [REDACTED]</p> <p>[REDACTED] conference and correspondence with private investigator regarding Brandon subpoena and conference with client to discuss strategy; correspondence and discussion with JSF regarding subpoenaed recordings between Stanulis and Land Air Sea; conference with counsel for Roa regarding subpoena [REDACTED] file affidavit of service for Pollak with Court via ECF; conference with client regarding [REDACTED]</p> <p>[REDACTED] correspondence with client and private investigator, respectively, regarding conference; conduct conference with client and private investigator regarding strategy and hearing preparation; calendar strategy meeting; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED]</p> <p>[REDACTED] forward same to client. PEM and JSE via email; correspondence with counsel for [REDACTED]</p> |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/14/2023 | EK | 1 | \$300.00 | \$300.00 | Correspondence with JSF and client regarding strategy and efforts to obtain proof of violations of the temporary restraining Order; extensive correspondence and discussion with JSF forwarding Land Air Sea subpoena materials received; correspondence with Roa, private investigator, and client regarding same; correspondence with counsel for Elefterakis, Pollak, and Bridda regarding [REDACTED] correspondence with client, JSF, and private investigator regarding strategy and efforts to obtain proof of violations of the temporary restraining Order; correspondence with process server regarding service on Google; correspondence with process server regarding service on Brandon; extensive correspondence with client and JSF regarding response from forensic analyst and removal of items from Relativity; [REDACTED] correspondence with client and JSF regarding same; correspondence with forensic analyst regarding questions related to production; forward same to client, RFM, and JSF via email; review voice message from private investigator; correspondence with process server regarding service on Lumina; correspondence with process server regarding service on Land Air Sea Systems (x2); file affidavit of service for Land Air Sea Systems with Court via ECF; review voice message from private investigator. |
| 3/15/2023 | EK | 1 | \$300.00 | \$300.00 | Review voice message from private investigator (x2); forward each to client and JSF via email with correspondence regarding same; conference with private investigator regarding strategy; review correspondence from process server with affidavits of service for Vito, Brandon, and Safa; correspondence with client regarding memorandum of law in support of renewed motion for temporary restraining Order; review correspondence from forensic analyst regarding text messages and related issues; forward same to client, RFM, and JSF via email; correspondence with client regarding forensic analyst bills; correspondence with process server, client, and Roa regarding service on Elefterakis; [REDACTED] correspondence with JSF regarding subpoena response for Land Air Sea; correspondence with Google regarding subpoena; forward same to client, private investigator, and JSF via email; correspondence and conference with private investigator regarding Brandon; review correspondence from process server regarding service on Lumina Systems, Bridda, Elefterakis, Five Pillars, and GoDaddy entities; review correspondence from Land Air Sea with subpoena response; forward same to client, JSF, RFM, and private investigator via email. |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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| 3/16/2023 | EK | 0.4 | \$300.00 | \$120.00 | Correspondence with clients regarding [REDACTED] correspondence with private investigator regarding same; review correspondence from process server regarding service on Five Pillars; review voice message from private investigator; compile and file affidavits of service for subpoenas; file same with Court via ECF; correspondence with Google regarding objections to subpoena; correspondence with private investigator regarding pre-hearing meeting. |
| 3/17/2023 | JF | 0.7 | \$450.00 | \$315.00 | Review opposition to motion for renewed injunction |
| 3/17/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with Roa, client, and JSF regarding declaration of Gomez to show violation of temporary restraining Order; extensive correspondence with private investigator regarding conference; conference with private investigator regarding strategy and upcoming meeting; review correspondence from process server regarding service on Mark Purificati and Tiffany Uribe, respectively; correspondence with client, Roa, RFM, JSF, and process server regarding same; correspondence with RFM regarding process server invoices; correspondence with client forwarding objections received from Google regarding subpoena; extensive correspondence and conference with client regarding same; review correspondence from PayPal concerning payment for private investigator; correspondence with Roa, client, and JSF regarding Beibin's information for subpoena; review ECF bounces from opposing counsel with opposition papers (x6); correspondence with client, RFM, and JSF regarding notes for our reply; correspondence with client, RFM, JSF, and private investigator attaching complete set of opposition papers; correspondence with PS regarding printing same for meeting on Sunday; correspondence with client regarding conference; conduct conference with client regarding opposition papers and reply strategy; post-mortem correspondence with client and JSF regarding same; conference with opposing counsel regarding reply to counterclaims and settlement of temporary restraining Order and pre-judgment attachment; finalize and submit letter to Court concerning existence of and response to counterclaims, missing exhibit to Levi Declaration, and resubmission of Roa Declaration with accessible links; correspondence with Roa's counsel regarding [REDACTED] [REDACTED] correspondence with client regarding same; review ECF bounce from Roa with reply letter in further support of letter motion to compel discovery. |
| 3/18/2023 | EK | 0.3 | \$300.00 | \$90.00 | Submit payment for private investigator; correspondence with accounting department, AG, and RFM regarding same; prepare subpoena to Jeff Beiben; submit same to process server, client, and JSF via email with instructions for service; correspondence with private investigator regarding proof of service upon Brandon. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/19/2023 | EK | 2.2 | \$300.00 | \$660.00 | Conduct strategy meeting with client and private investigator; correspondence with client regarding research in support of irreparable harm; conduct research regarding Order of attachment of property outside the State of New York; extensive correspondence with JSF, private investigator, and client regarding same; correspondence with client regarding opening statement; correspondence with client, JSF, and private investigator regarding [REDACTED]; post-mortem meeting with private investigator. |
| 3/20/2023 | JF | 0.3 | \$450.00 | \$135.00 | Conference with E. Kataev and client regarding [REDACTED] |
| 3/20/2023 | EK | 1 | \$- | \$- | Travel time. |
| 3/20/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with client and JSF regarding arguments related to Order of attachment; correspondence with process server regarding Beiben subpoena; correspondence with all counsel of record regarding same; [REDACTED] post-mortem with client regarding same; [REDACTED] conference and correspondence with client regarding copy of memorandum of law in support of renewed motion for temporary restraining Order; correspondence with process server regarding issues with serving Bieben; forward same to client and Roa via email; correspondence with client, RFM, and JSF regarding opening statement; correspondence with counsel for Liakas regarding [REDACTED] forward same to client via email; review ECF bounce from counsel for Elefterakis Pollak & Bridda with letter motion for pre-motion conference. |
| 3/21/2023 | EK | 1.5 | \$- | \$- | Travel time. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/21/2023 | EK | 2 | \$300.00 | \$600.00 | Correspondence with process server regarding service on Purificati, Uribe, and Beiben (x2), respectively; correspondence with client regarding sales by customer summaries for Defendants; correspondence with counsel for Elefterakis Pollak & Bridda regarding subpoenas to appear at hearing; forward same to client and JSF via email; [REDACTED] [REDACTED] correspondence with counsel for Roa in state court action regarding subpoena response from Land Air Sea; correspondence with client regarding opening statement; attend telephonic discovery conference before USMJ Cho on Roa's motion to compel; review ECF bounce from Court with USMJ minute entry for same; correspondence and conference with client regarding same [REDACTED] correspondence and conference with client regarding oral argument outline for hearing; correspondence with Roa and client regarding service-related issues; calendar deadline to oppose letter motion for pre-motion conference by Elefterakis Pollak & Bridda; correspondence with client and JSF regarding same; review reply correspondence from JSF regarding same; correspondence with process server regarding information to assist in service on Beiben; correspondence with client, Roa, and JSF regarding reply declaration of Gomez with exhibits; review correspondence from client regarding updated opening statement; review correspondence from client regarding cross-examination of Pollak; review and revise reply memorandum of law. |
| 3/22/2023 | JF | 1.5 | \$450.00 | \$675.00 | Review reply in further support of renewed motion for injunction; conference with E. Kataev regarding same |

IME WatchDog, Inc. v. Gelardi; Case No.: 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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|-----------|----|---|----------|----------|--|
| 3/22/2023 | EK | 3 | \$300.00 | \$900.00 | <p>Draft reply memorandum of law in further support of second motion for injunctive relief; submit same to client and JSF via email with correspondence regarding same; correspondence with client regarding same; review reply correspondence from client with revised reply memorandum of law; correspondence with client and JSF regarding same; review reply correspondence from JSF with revised reply memorandum of law; review reply correspondence from client with further revised reply memorandum of law; correspondence with client regarding discovery; [REDACTED] review correspondence from process server regarding service on Uribe, Purificati, and Beiben; correspondence with client and JSF regarding subpoenaed documents from Land Air Sea in Roa state court action; correspondence and conference with counsel for Elefterakis Pollak & Bridda regarding settlement; conference with client regarding same; [REDACTED] correspondence and conference with client regarding envelopes containing slanderous material; forward same to private investigator via email; extensive correspondence with client regarding comparison of revenues between WatchDog and Companions; correspondence with counsel for Elefterakis Pollak & Bridda regarding consent for one week extension of time to oppose letter motion for pre-motion conference; forward same to client and JSF via email; correspondence with counsel for Elefterakis Pollak & Bridda regarding [REDACTED] forward same to client, RFM, and JSF via email; correspondence with client, RFM, and JSF regarding same; conference and correspondence with client regarding reply papers; calendar and conduct virtual meeting with client regarding declarations in support; draft and submit Levi reply declaration to client via email; correspondence with client regarding Gomez; revise and submit Gomez reply declaration to Gomez; correspondence with JSF regarding reply declaration and inclusion of same in reply memorandum of law; draft and file letter motion for leave to file excess pages with Court via ECF; review ECF bounce from Court with USDJ Order granting same; correspondence with JSF, RFM, and client regarding final review of and proposed revisions to reply memorandum of law; correspondence and conference with JSF regarding reply memorandum of law; continue to review and revise reply memorandum of law; conference with</p> |
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Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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|-----------|----|-----|----------|----------|---|
| 3/23/2023 | EK | 1.5 | \$300.00 | \$450.00 | Correspondence with client regarding meeting to prepare [REDACTED]; conference with private investigator regarding hearing preparation; correspondence with client regarding Land Air Sea subpoena responses in state court action; correspondence with private investigator regarding envelopes and witness preparation; correspondence with JSF regarding USDJ Order related to leave to file excess pages and request for courtesy copies; correspondence with process server regarding affidavits of non-service; review correspondence from GoDaddy regarding subpoena; review ECF bounce from Court with USDJ Order regarding counterclaims; correspondence and discussion with JSF regarding same; review voice message from counsel for Brandon; forward same to client and JSF via email with correspondence regarding same; conference with JSF regarding same; conference with counsel for Brandon and JSF regarding subpoena; conduct video call with client regarding same; meeting with client and Roa regarding preparation [REDACTED] draft cover letter and binder covers for both binders; submit same to Court via ECF; review correspondence from opposing counsel with cover letter enclosing courtesy copies; forward same to client, RFM, JSF, and Roa's counsel via email with correspondence regarding same; review ECF bounce from opposing counsel with cover letter; correspondence with Brandon's counsel. |
| 3/24/2023 | JF | 0.8 | \$450.00 | \$360.00 | Interoffice meeting with E. Kataev; review outline for Safa cross; review declaration |

IME WatchDog, Inc. v. Gelardi, et al. Case No.: 1:22-cv-1032 (PKC) (JRC)**Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion**

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|-----------|----|-----|----------|------------|---|
| 3/24/2023 | EK | 1.8 | \$300.00 | \$540.00 | Review correspondence from Teams regarding tasks; correspondence with client regarding meeting; correspondence with client regarding condensed cross-examination questions; meeting with client to prepare for cross-examination; conference with Brandon's counsel regarding subpoena; conference with Roa's other counsel regarding Stanulis; correspondence with Roa's other counsel, client, and Roa regarding same; review ECF bounce from opposing counsel with Beiben declaration in opposition; correspondence with client, Roa, and JSF regarding Client Exam Services LLC; correspondence and discussion with Roa regarding NYS DOS records request; correspondence with GoDaddy subpoena compliance center; forward same to client and JSF via email; review and finalize NYS DOS records request; correspondence and discussion with AG regarding FedEx slip & submission of same via facsimile; conference and correspondence with Lumina Systems regarding website; forward same to client and JSF via email; correspondence with client regarding extended cross-examination questions and revisions to same; conference and correspondence with JSF regarding review of cross-examination questions and Lumina affidavit; correspondence with NYS DOS regarding certified copies of corporate filings; forward same to client, Roa, and JSF via email; correspondence and conference with private investigator regarding investigation of Client Exam Services LLC; correspondence with JSF and client regarding cross-examination of Safa; review ECF bounce from opposing counsel with cover letter enclosing affidavit from principal of Lumina Systems; correspondence with client regarding same; correspondence with Roa and client regarding principal of Client Exam Services LLC; forward same to private investigator via email with correspondence regarding same. |
| 3/25/2023 | JF | 2.5 | \$450.00 | \$1,125.00 | Prepare for hearing |
| 3/25/2023 | EK | 3.3 | \$300.00 | \$990.00 | Correspondence with client and Roa regarding exhibits; correspondence with client and Roa regarding hearing and cross-examination; correspondence with private investigator regarding Client Exam Services LLC; correspondence with client and JSF regarding opening arguments; draft and file letter motion to compel appearance of Beiben with Court via ECF ; conduct document review on Relativity; conduct preparation meeting with client; review and revise cross-examination of Safa; compile and print all hearing exhibits; correspondence with private investigator regarding pre-hearing meeting for lunch. |
| 3/26/2023 | JF | 4.3 | \$450.00 | \$1,935.00 | Prepare for hearing |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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| 3/26/2023 | EK | 4.5 | \$300.00 | \$1,350.00 | Review ECF bounce from Court with USDJ Order granting letter motion to compel; correspondence with JSF, client, and Roa regarding same; conference and correspondence with private investigator regarding meeting location for pre-hearing strategy session; correspondence with client, Roa, and JSF regarding same; correspondence with Roa, client, and JSF regarding exhibits; conduct hearing preparation; review and revise cross-examination for Safa; compile exhibits in hard copy & electronic format; conference with client regarding opening statement; review and revise opening statement; review and revise cross-examination for Pollak; submit both to client and JSF; review correspondence from client with revisions to opening statement; review correspondence from client with revised cross-examination for Pollak; prepare cross-examination for Beiben; submit same to client and JSF via email; conference with client regarding same; correspondence with client and JSF regarding additional cross-examination questions for Safa and oral argument outline; correspondence with client and Roa regarding exhibits for cross; correspondence with counsel for Elefterakis Pollak & Bridda regarding Elefterakis' failure to appear; correspondence with JSF, RFM, and client regarding same; correspondence with client and JSF regarding anticipated Order of witnesses; correspondence with client and JSF regarding preparation. |
| 3/27/2023 | JF | 1.2 | \$450.00 | \$540.00 | Prepare oral argument outline |
| 3/27/2023 | EK | 2 | \$- | \$- | Travel time. |

Milman Labuda Law Group PLLC Attorney Fees' for Contempt Motion

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|-----------|--------|-------|----------|-------------|---|
| 3/27/2023 | EK | 4.2 | \$300.00 | \$1,260.00 | Correspondence with client, RFM, and JSF regarding contempt motion against Elefterakis; correspondence with JSF regarding oral argument outline; forward same to client via email; review ECF bounce from counsel for Elefterakis Pollak & Brida regarding virtual appearance by Elefterakis; correspondence with private investigator regarding pre-hearing meeting; conference with Roa's counsel regarding same; prepare cross-examination questions for Safa regarding badges of fraud; submit same to client and JSF via email; correspondence with client, Roa, and JSF regarding Dropbox link for exhibits; review correspondence from opposing counsel with communications between Safa and Silver Shield; review ECF bounce from Court with USDJ Order regarding Elefterakis' remote appearance; correspondence with MJM regarding hearing; post-mortem meeting with client; extensive correspondence with litigation team regarding list of customers to submit to Court; calendar and conduct virtual meeting with client regarding submission of letter with customer list; review ECF bounce from Court with minute entry for proceedings held; correspondence with court reporter and opposing counsel regarding transcript request; correspondence with client regarding text messages; correspondence with Roa and client regarding 2017 master list; correspondence with Roa and client regarding all text messages; extensive correspondence with client and Roa regarding submission of client list; finalize cover letter concerning submission of client list; compile all exhibits; file cover letter with exhibits with Court under seal; submit same to opposing counsel, JSF, and Roa's counsel via email with correspondence regarding same; forward same to client, RFM, and JSF via email; correspondence with JSF regarding filing under seal. |
| 3/27/2023 | JF | 8.7 | \$450.00 | \$3,915.00 | Appear for injunction hearing |
| | TOTALS | 220.1 | | \$72,802.50 | |